

FINAL 2021 Action Plan of the 2020-2024 Five-Year Consolidated Plan

PREPARED FOR THE

Erie County / Town of West Seneca Community Development
Block Grant Consortium, and the

Erie County / Town of Hamburg / Town of West Seneca Home
Consortium, and the

Town of Hamburg – Community Development
Entitlement Program

Submitted by:

The Erie County Department of Environment and Planning

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COUNTY EXECUTIVE

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COMMISSIONER

March 12, 2021

FY 2021 Annual Action Plan

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SF-424

- *CDBG*
- *HOME*
- *ESG*

Certifications

Town of Hamburg

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SF-424

- *CDBG*

Certifications

Citizen Participation

Executive Summary

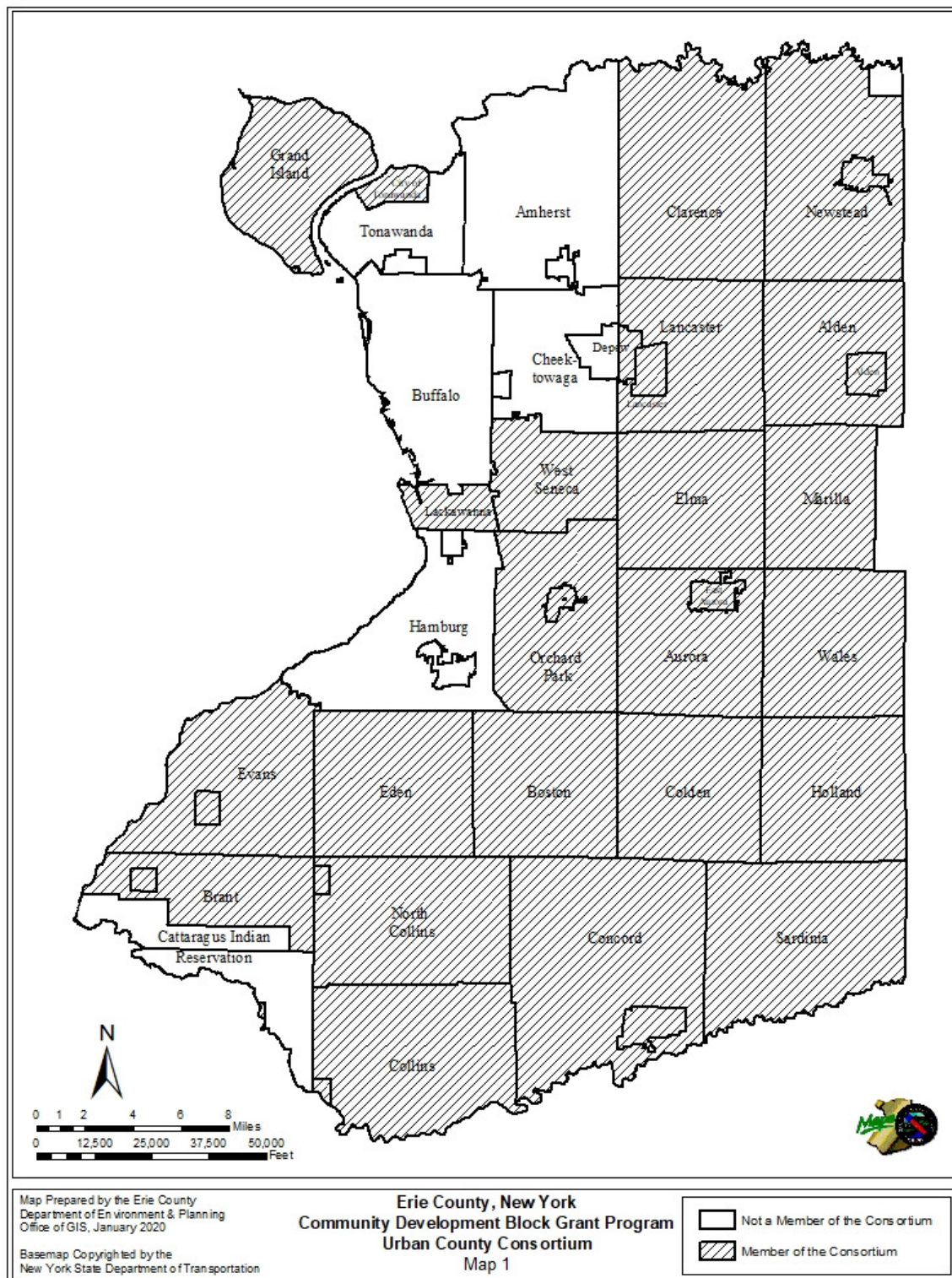
AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

The Erie County Community Development Block Grant (CDBG) Consortium is made up of 34 municipalities. The Erie County Department of Environment and Planning (DEP) administers the CDBG and Emergency Solutions Grant (ESG) Program grants on behalf of the CDBG Consortium communities. The DEP also administers the Erie County HOME Consortium, which is comprised of the 34 CDBG Consortium municipalities and the Town of Hamburg and its two villages—the Villages of Hamburg and Blasdell.

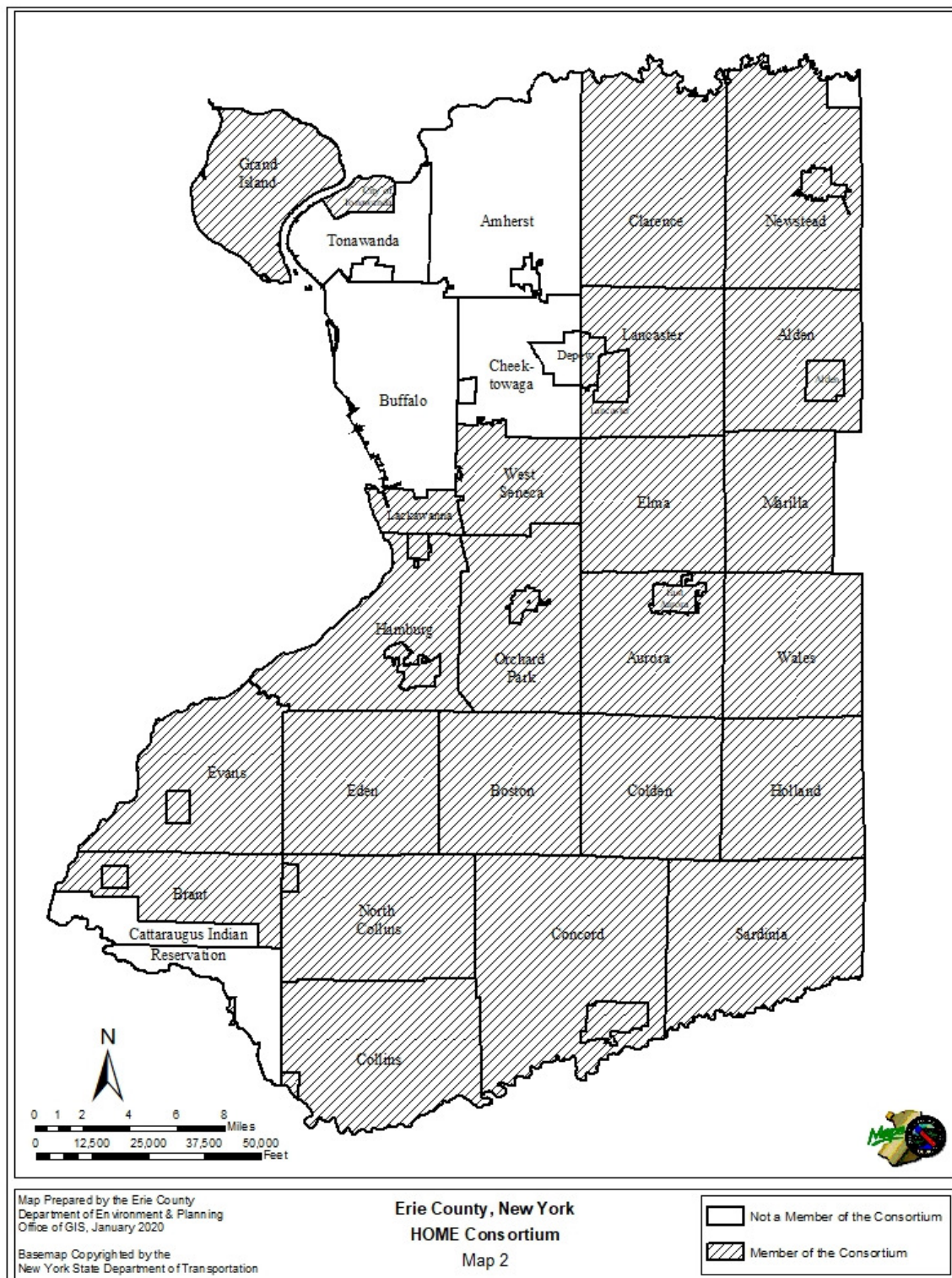
The Erie County CDBG Consortium and Erie County HOME Consortium are required to prepare this Five-Year Consolidated Plan (CP) for the CDBG, HOME and ESG federal grant programs in order to guide federal funding allocations for housing, community development and economic development activities within their communities. This CP covers the period from FY 2020 through FY 2024 (April 1, 2020 to March 31, 2024). This Action Plan for the 2021 program is Year 2 of the 5 Year Consolidated Plan.

Attached are Maps 1 and 2 of the consortium CDBG and HOME service areas. Also attached are Maps 3-6 that address geographic priorities.



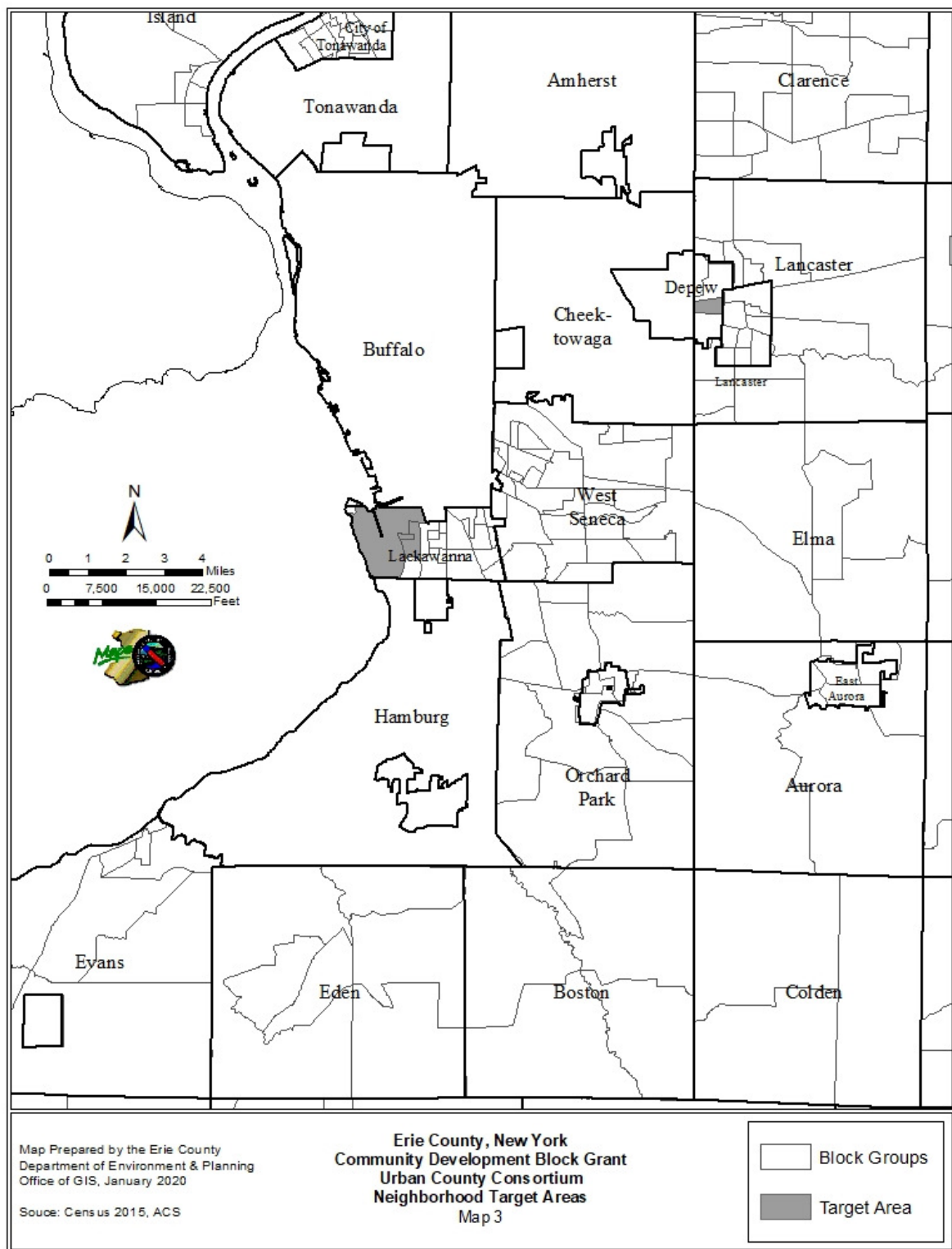
Map 1- CDBG Service Area

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 2021



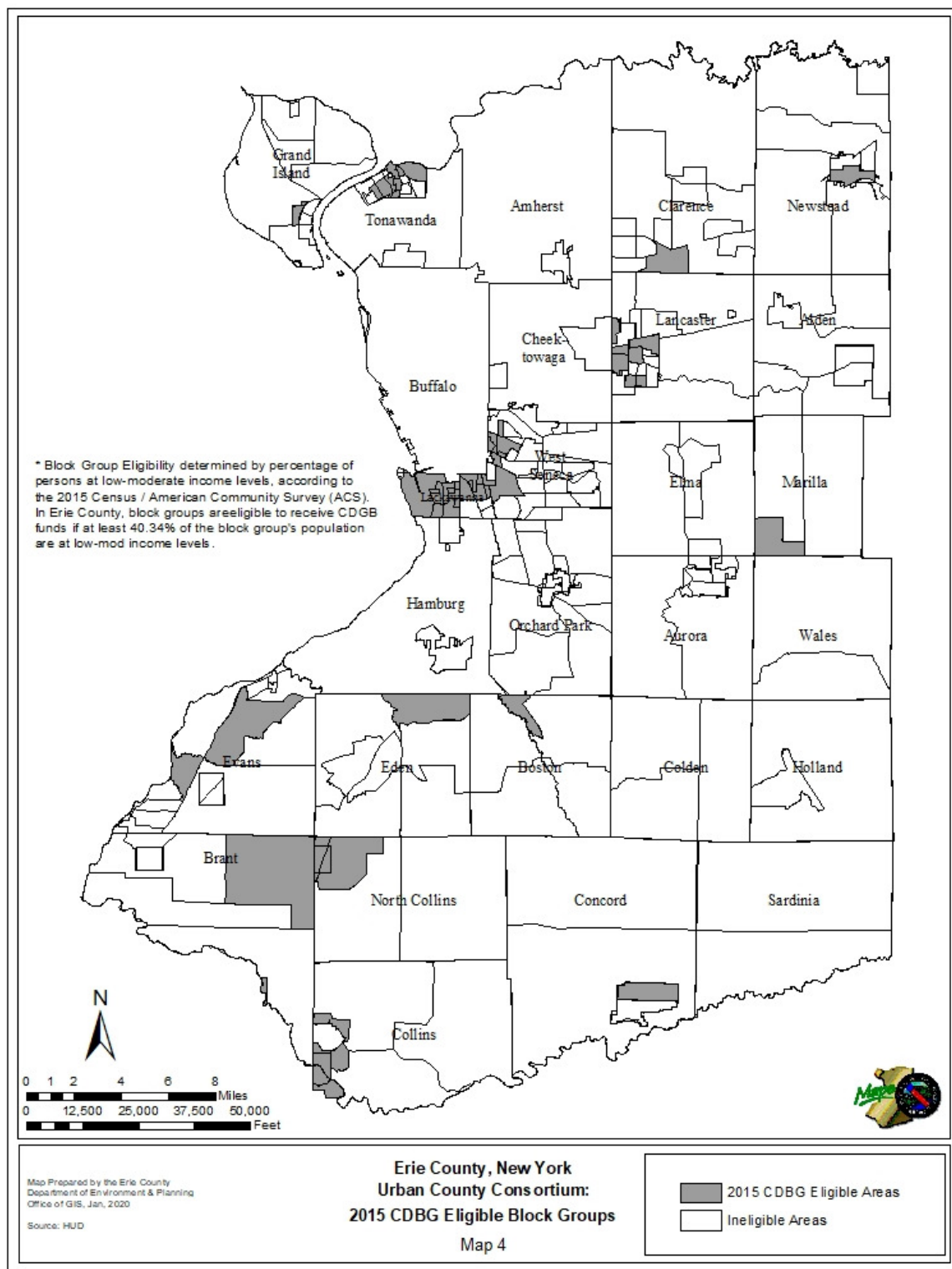
Map 2- HOME Service Area

Annual Action Plan
2021



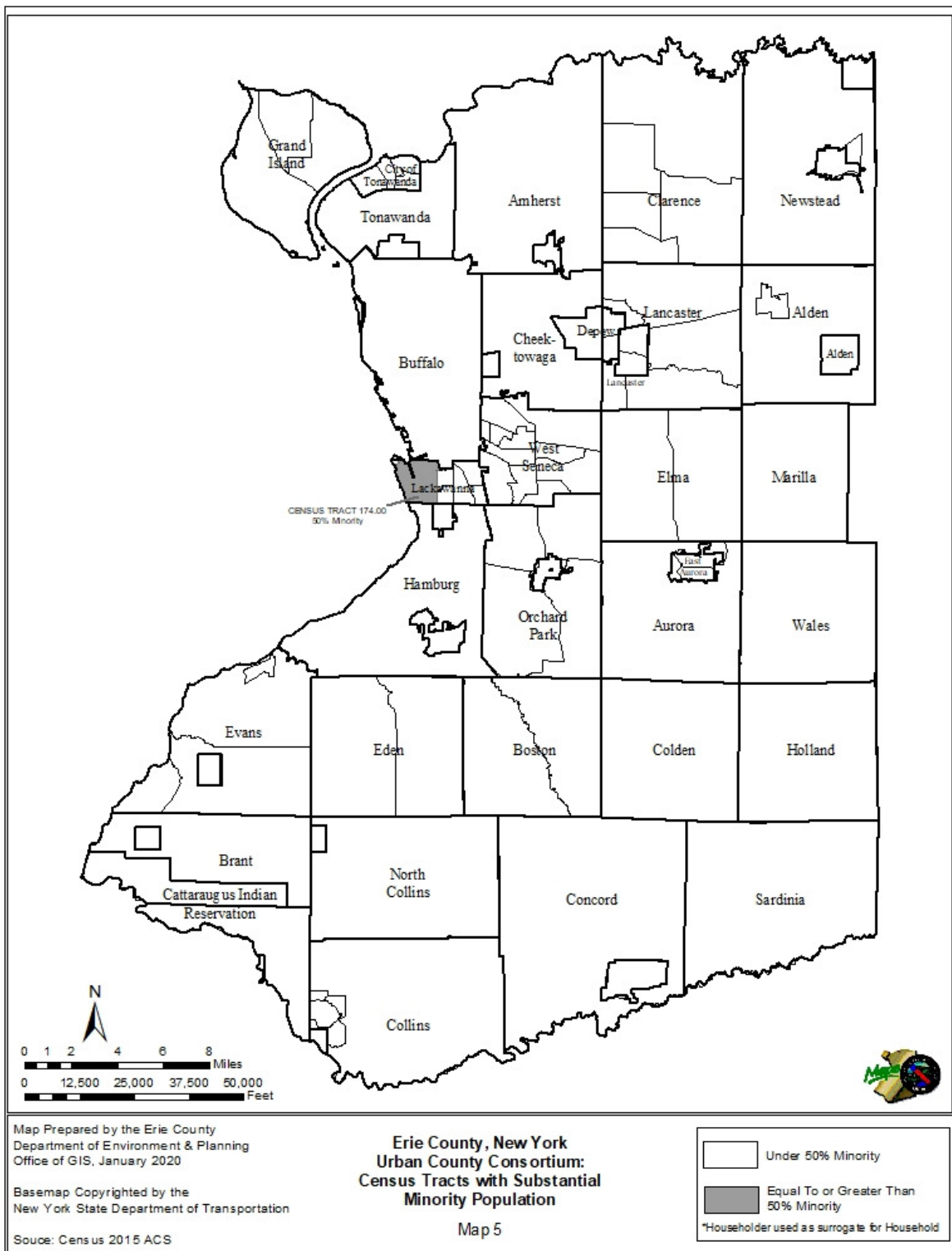
Map 3- Target Areas

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2021



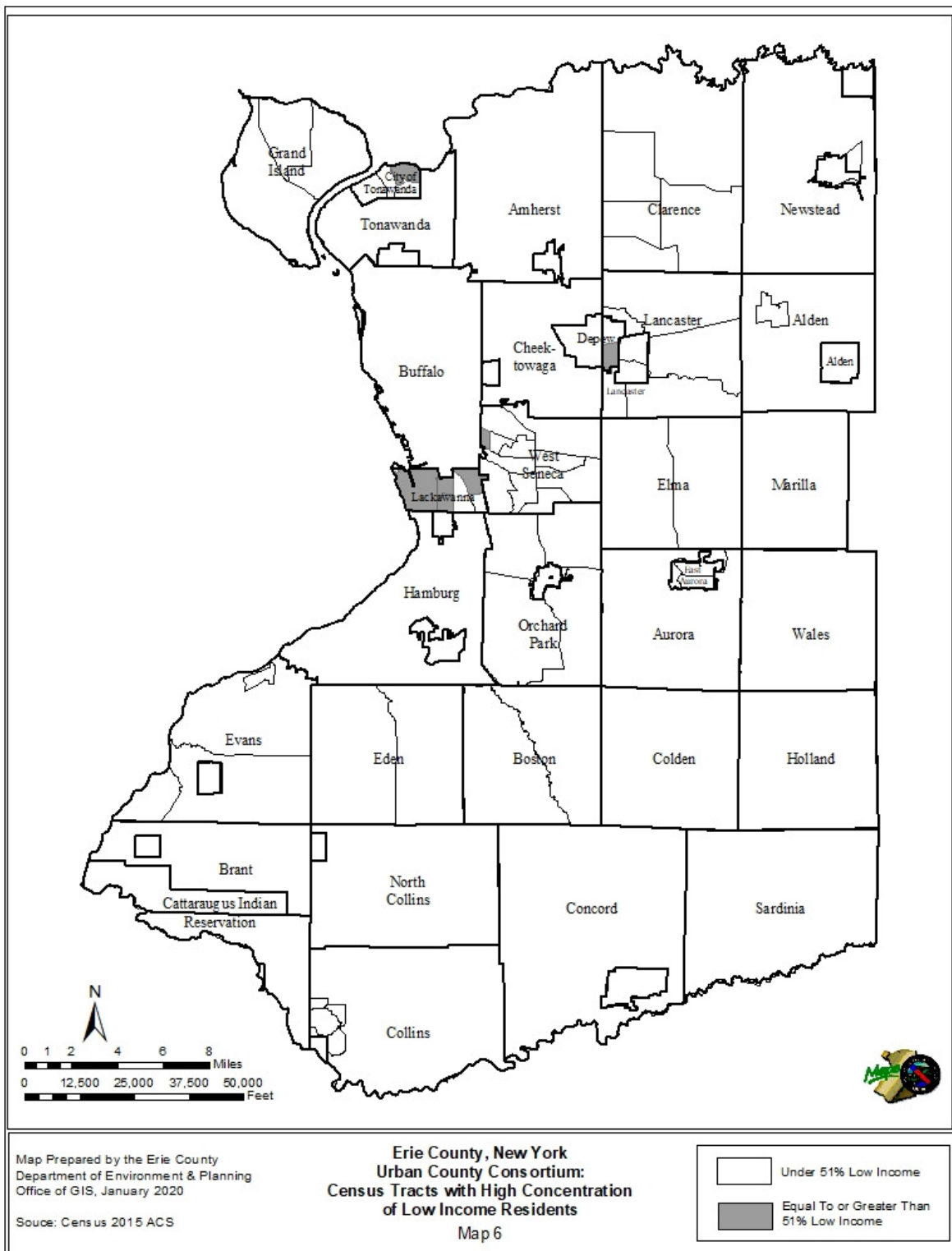
Map 4- Income Eligible Block Groups

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Map 5- Census Tracts With High Minority Concentration

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Map 6- Census Tracts with High Percentage of Low Income People

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2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The 2021 budget is attached. A positive trend is the high amount of other funds \$3,449,881 and program income (approximately \$681,136) being combined with the Consortium's annual entitlement grant allocations. This further stretches federal dollars and allows the overall program to better address the high-priority areas. Below are highlights for the 2021 Program Year: Community Development Highlights Eleven (12) community projects will be funded this year. This represents approximately 37% of the entitlement grant allocation. T. Holland- Senior Van Purchase: \$39,162; V. Orchard Park- Business District ADA Curb Improvements: \$50,000; T. Newstead- Senior Center LED Lighting: \$31,829; T. Elma- Senior Center Floor Improvements: \$50,249; T. Concord- Senior Center Parking Lot Improvements: \$60,000; T. Eden- Green/Welch Lane Sidewalk Replacement; \$45,714; C. Lackawanna- Center Street Road Reconstruction-\$150,000; Various Communities- Rural Transit Service: \$270,000; V. North Collins- Harrison/Railroad Waterline Replacement: \$150,000; T. Boston- Boston State Road area Waterline Replacement: \$150,000.

A substantial commitment of CDBG funds will again be allocated to the Rural Transit Services Project. The service is offered in twenty-five municipalities and provides van transportation to doctor offices, shopping centers, senior centers and other destinations for low-income and seniors.

Housing and

Emergency Solutions Programs Highlights

Over 72 households are on the wait list for the Housing Rehabilitation Program and 47 are on the Mobile Home wait list. Priority is given to those residing in target areas and older housing stock, as well as those having lower incomes.

The Emergency Solutions Grant Program will provide homeless and at risk of being homeless individuals and families assistance to find/maintain permanent housing. Other services include case management, housing search and legal services. Economic Development Highlights-Infrastructure improvements and reconstructions include Village of Springville-Smart Growth Initiative-Franklin Street/Eaton Park-Business District Improvements- \$325,000; City of Tonawanda- Grove Minerva Streets Sanitary Sewer Re-lining- \$150,000; Village of Gowanda- Municipal Parking Lot Re-Paving- \$150,000.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The following provides a brief summary highlighting key achievements in the four major funding categories.

1. Administration: Erie County successfully adhered to several key indicators established by HUD to gauge an entitlement's performance. One of those indicators was the timeliness standard where Erie County met its goal. As of January 31, 2020, Erie County had achieved the timeliness standard by having 1.39 times the dollar amount of the 2019 CDBG grant award in the unexpended category.

Other key administrative achievements were the expenditure of 100% of all non-planning/admin monies on activities targeted to benefitting low/moderate income people, as well as staying under the required administrative cap of 20% by expending 17.24% on planning and administration and achieving staying under the required public services cap of 15% by expending 12.13% on public service expenses.

2. Community Projects: 13 projects were completed in 2019 benefitting low/moderate income people. The Rural Transit Service Program continued its successful efforts by helping 1,734 seniors and low-income people gain better access to shopping and medical appointments.

3. Economic Development: Two smart growth projects began construction in the spring/summer of 2020. The projects will assist a low income population in the Villages of Alden and Lancaster with smart growth infrastructure improvements in the central business district. In 2019 the Commercial Center Improvement Program continued with two businesses completed with exterior rehabilitation with CDBG funding assistance and three underway. Much of the work in 2019 was completed in the Village of Angola and Town of Eden.

4. Housing: Taken together, the Erie County housing programs assisted 78 low/mod income households in 2019. Goals were achieved in the mobile home repair and owner occupied rehab programs. The prioritized wait list for the popular Housing Rehabilitation Program begun in 2005 is now resulting in more homes being completed in the two older areas of the Consortium. In 2019, 23% of all County rehab cases were in the City of Lackawanna, and Village of Depew target areas.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Consortia's Citizen Participation Plan (CPP) sets forth the procedures and policies the Consortia will use to encourage citizen participation in the development, operation and reporting of their annual CDBG, ESG and HOME grants and the Consolidated Plan. Citizens are encouraged to participate in the development of the Consolidated and Annual Plans, any substantial amendments to the Plans, and the CAPER. This participation by low- and moderate-income persons, particularly those living in designated target areas and in areas where CDBG funds are proposed to be used, and by residents of predominantly low and moderate income neighborhoods, is particularly encouraged as is the participation of all residents, including seniors, minorities and persons with disabilities.

By implementing the CPP, the Consortia will become more aware and sensitive to low- and moderate-income citizens' needs. It will also afford the Consortia an opportunity to better inform the public of the purpose of the CDBG, ESG and HOME grants and the grant allocation process, and ensure that selected projects are meeting the needs of these constituents.

Participation Prior to the solicitation and selection of the 2021 CD projects, a series of meetings were held. County staff met with representatives of municipalities, community-based organizations and housing-related agencies to encourage citizen participation in a series of county-wide public forums. The meetings were also used to inform the public about the CDBG, HOME, and ESG programs, the type of projects eligible for funding, and the project selection process. Articles appeared in local and community newspapers informing the public about the county-wide forums and encouraging their participation.

These forums for residents of the 37 municipalities were held September 22 and September 23, for the purpose of receiving input from them on needs in human services, housing, community/neighborhood improvements and economic development. The forums were held virtually by a call-in number to ensure safety of all residents due to the Covid pandemic.

Each municipality in the Consortium also held virtual community development public hearings. Please refer to Section AP-85- Other Actions- to review criteria for changes to the draft budget based on final funding allocations from HUD.

Attached is a table showing all of the dates and times of each municipal public hearing.

CITIZEN PARTICIPATION PROCESS

2021-2022

ERIE COUNTY CDBG URBAN CONSORTIUM

<u>SPONSOR</u>	<u>DATE</u>	<u>TIME</u>	<u>LOCATION</u>
ERIE COUNTY-			
CONSORTIUM-WIDE	9/22/2020	7:00 P.M.	CALL IN VIRTUAL MEETING
CITIZEN FORUMS:	9/23/2020	7:00 P.M.	CALL IN VIRTUAL MEETING
MUNICIPAL HEARINGS:			
LACKAWANNA, C.	10/7/2020	9:00 A.M.	CITY HALL COUNCIL CHAMBERS
TONAWANDA, C.	9/30/2020	5:00 P.M.	CITY HALL COURT ROOM
ALDEN, T.	10/6/2020	7:05 P.M.	TOWN HALL
ALDEN, V.	10/13/2020	7:35 P.M.	VILLAGE HALL
AURORA, T.	10/13/2020	7:00 P.M.	AURORA MUNICIPAL CENTER MEETING ROOM
EAST AURORA, V.	10/5/2020	7:00 P.M.	VILLAGE HALL
BOSTON, T.	10/7/2020	7:30 P.M.	TOWN HALL
BRANT, T.	10/13/2020	7:15 P.M.	TOWN HALL
FARNHAM, V.	10/20/2020	7:30 P.M.	VILLAGE HALL
CLARENCE, T.	10/23/2020	9:10 A.M.	TOWN HALL
COLDEN, T.	10/8/2020	7:00 P.M.	TOWN HALL
COLLINS, T.	10/5/2020	7:30 P.M.	TOWN HALL
GOWANDA, V.	10/13/2020	5:45 P.M.	VILLAGE HALL
CONCORD, T.	10/8/2020	6:30 P.M.	TOWN HALL
SPRINGVILLE, V.	10/19/2020	7:00 P.M.	VILLAGE COURT
EDEN, T.	10/14/2020	7:30 P.M.	TOWN HALL
ELMA, T.	10/21/2020	7:00 P.M.	TOWN HALL
EVANS, T.	10/7/2020	7:10 P.M.	ZOOM MEETING
ANGOLA, V.	10/19/2020	7:15 P.M.	ZOOM MEETING
GRAND ISLAND, T.	10/5/2020	8:00 P.M.	TOWN HALL
HOLLAND, T.	10/14/2020	8:00 P.M.	TOWN HALL
LANCASTER, T.	9/21/2020	7:15 P.M.	TELECONFERENCE
LANCASTER, V.	9/14/2020	7:15 P.M.	VILLAGE HALL
DEPEW, V.	10/13/2020	7:00 P.M.	VILLAGE HALL
MARILLA, T.	10/8/2020	7:30 P.M.	TOWN HALL
NEWSTEAD, T.	9/28/2020	7:20 P.M.	TOWN HALL
AKRON, V.	10/5/2020	7:00 P.M.	VILLAGE HALL
NORTH COLLINS, T.	10/19/2020	4:00 P.M.	TOWN HALL
NORTH COLLINS, V.	10/19/2020	6:30 P.M.	VILLAGE MUNICIPAL OFFICE
ORCHARD PARK, T.	10/7/2020	7:00 P.M.	MUNICIPAL CTR.-BOARD ROOM
ORCHARD PARK, V.	9/14/2020	7:00 P.M.	MUNICIPAL CTR.
SARDINIA, T.			
WALES, T.	10/13/2020	7:00 P.M.	COMMUNITY CENTER
WEST SENECA, T.	9/28/2020	6:00 P.M.	TOWN HALL-COURT
HAMBURG, T.	9/14/2020 5:00 P.M.	6:30 P.M.	TOWN HALL- LOBBY
"	9/28/2020 5:00 P.M.	6:30 P.M.	TOWN HALL- LOBBY
"	10/7/2020	4:00 P.M.	TOWN HALL- LOBBY
"	10/19/2020 5:00 P.M.	6:30 P.M.	TOWN HALL- LOBBY
	9/16/2020	5:30 P.M.	BLASDELL VILLAGE HALL - LOBBY
COORDINATING COMMITTEE			1004 RATH BLDG., BUFFALO
CONSOLIDATED	1/26/2021	7:00 P.M.	CALL IN VIRTUAL MEETING
PLAN ("DRAFT")	1/27/2021	7:00 P.M.	CALL IN VIRTUAL MEETING
PUBLIC HEARINGS	1/28/2021	7:00 P.M.	CALL IN VIRTUAL MEETING

Citizen Participation Hearings

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The following identifies comments and responses made during the citizen participation process.

1. Housing Needs:

a) Increase affordable housing, especially affordable senior housing. More funds for housing rehab along with mobile home repair funding. Need for increased funding for rental properties.

2. Human Service Needs:

a) Need expressed for Erie County to increase its social services presence in rural areas of the county. Need for increase for food pantry's- especially underutilized deteriorated building in the Village of Depew.

b) Need for increased funding for handicapped accessible improvement projects and transportation services. Need for public hearings to be held by conference call to assist the handicapped and senior populations of the consortium.

3. Neighborhood / Community Development Needs:

a) Need for increased funding for deteriorated sidewalks and road paving infrastructure in older low income neighborhoods. Request for increased funding for water/sewer replacement for older deteriorated areas of the Consortium.

b) Need for increased recreation improvements for youth especially in the Village of North Collins and Town of Evans and walking path improvements in the Town of West Seneca.

4. Economic Development Needs:

a) Business assistance programs needed to assist small businesses and for improvements to village center areas. Physical improvements such as grants to businesses and streetscape updates are needed. Improvements needed to municipal parking lots. Increase in funding for micro-loans and especially grants due to the pandemic.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments or views were accepted.

7. Summary

N/A

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	ERIE COUNTY	Environment & Planning
HOME Administrator	ERIE COUNTY	Environment & Planning
ESG Administrator	ERIE COUNTY	Environment & Planning

Table 1 – Responsible Agencies

Narrative

The Erie County HOME Consortium is comprised of thirty-seven municipalities, while the Erie County Community Development Block Grant (CDBG) Consortium has thirty-four members. The Town of Hamburg and the two villages located therein are only members of the HOME entity. The Erie County Department of Environment and Planning (DEP) has been administering the Consortia since the late 1970s via three-year cooperation agreements. A memorandum of understanding co-signed by Erie County and member communities in 1998 is the guiding document that directs funding allocations and other administrative matters.

Consolidated Plan Public Contact Information

Paul J. D'Orlando
Principal Contract Monitor
County of Erie
Department of Environment & Planning
County Office Building

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AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

The Consortia developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included public meetings, published meeting notices, stakeholder meetings, in-person interviews, and telephone interviews. Furthermore, the DEP implements a range of affordable housing and community development activities, including administration of the CDBG, ESG and HOME programs; preparation of the Consolidated Plan (CP), the Consolidated Annual Performance Evaluation Report (CAPER), and the Annual Plan; technical assistance for and collaboration with non-profit and for-profit housing developers and social service agencies; and rehabilitation and other affordable housing projects. During the preparation of the CP, the Consortia consulted with many entities.

The primary role of private industry in Consortia activities are contractors to the housing rehabilitation cases undertaken annually as well as the community projects carried out with CDBG, ESG and HOME funding. Various commercial banks in the region are active participants in the affordable housing delivery system and serve on Consortia project committees. Financial assistance through the banking community is often used to leverage CDBG and HOME dollars in constructing new senior housing projects.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Homeless Alliance of Western New York (HAWNY) is the NY508-Buffalo/Niagara Falls, Erie, Niagara, Genesee, Orleans and Wyoming CoC lead. Erie County and other CoC members under the leadership of HAWNY established a coordinated entry system using a coordinated assessment—Vulnerability Index-Service Prioritization Decision Assistance Tools (VI-SPDATs). Despite homelessness being less concentrated in the Erie Consortia municipalities, and there are no emergency shelters located within the Consortia, the county funded Rapid rehousing(RRH) program utilizes the coordinated entry and coordinated with other RRH programs funded within the CoC to prioritize people within the consortia and serving those who are most in need. This entails providing apartments to homeless individuals and families who present only moderate barriers to achieving housing stability. Community Development staff in the Consortia have participated in the Prism Project Forum and Point in Time Count to survey the

homeless and help to create a database of services utilized by the chronically homeless. These projects, sponsored by HAWNY, have produced a Ten-Year Action Plan to end homelessness in the broader Erie County community. Among the priorities, the Plan sets for the community are permanent housing for the chronically homeless and permanent housing for clients dealing with mental health and/or substance abuse issues. Currently, there is only less than 6 chronically homeless individuals identified within Erie County. We have been prioritizing people who are most vulnerable and have the longest homeless history to housing to prevent anyone becoming chronically homeless. The CoC is expecting to end chronic homelessness within the upcoming year.

Two HUD-certified housing counseling agencies provide one-on-one counseling with low-moderate income eligible residents with housing issues who are often at risk of homelessness, credit/financial issues, apartment searches, tenant-landlord issues, fair housing issues, etc. Belmont Housing Resources for WNY administers the Section 8 rental assistance program for all of Erie County (except for the City of Buffalo) and provides the greatest amount of housing and credit counseling for individuals and families, while Buffalo Urban League offers legal assistance as well as credit counseling for those households at the risk of mortgage default or foreclosure.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

Erie County's Department of Environment & Planning (DEP) follows the CoC written standards, which details program policies and procedures, HMIS requirements, coordinated entry procedures and performance standards. The performance standards for activities funded under the County's ESG program were developed by the CoC. Staff for the CoC met with local government staff and homeless service providers to determine the performance standards for all programs including the homeless rapid re-housing programs and the homelessness prevention programs. Homeless Alliance of Western New York, the lead of the CoC and Homeless Management Information System (HMIS), administers the data collection and produce project and system performance quarterly.

HAWNY also produces an Annual Need Report and Ten-year plan to analyze the needs and gaps within each geographic area. DEP utilizes the Annual report and Ten-Year Plan to set up program priority and evaluate funded programs using the performance report.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Lackawanna Municipal Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The housing authority was consulted by interview regarding the needs of public housing residents.
2	Agency/Group/Organization	Tonawanda Municipal Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The housing authority was consulted by interview regarding the needs of public housing residents.
3	Agency/Group/Organization	ERIE COUNTY INDUSTRIAL DEVELOPMENT AGENCY
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the economic needs of Erie County.
4	Agency/Group/Organization	Erie Co. Dept. of Social Services
	Agency/Group/Organization Type	Services - Various Social
	What section of the Plan was addressed by Consultation?	Human Services Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of social services clients in Erie County.
5	Agency/Group/Organization	Erie Co. Dept. of Senior Services
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of senior citizens in Erie County.
6	Agency/Group/Organization	Erie Co. Dept. of Mental Health
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Human Service Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of mental health clients in Erie County.
7	Agency/Group/Organization	HOMELESS ALLIANCE OF WESTERN NEW YORK
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of the homeless population in Erie County.
8	Agency/Group/Organization	Restoration Society, Inc.
	Agency/Group/Organization Type	Services-homeless

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	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of the homeless population in Erie County.
9	Agency/Group/Organization	HOUSING OPPORTUNITIES MADE EQUAL, INC.
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of the rental housing population in Erie County.
10	Agency/Group/Organization	BELMONT SHELTER CORP
	Agency/Group/Organization Type	Housing Services - Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of the rental housing population in Erie County.

Identify any Agency Types not consulted and provide rationale for not consulting

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3 – Other local / regional / federal planning efforts

Narrative

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AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

In accordance with 24 CFR 91.100(4), the Consortia will notify adjacent units of local government of the non-housing community development needs included in the CP. The Erie County CDBG Consortium and the Town of Hamburg are committed to increasing citizen awareness and involvement in the preparation and implementation of the CDBG, HOME and ESG Programs. Through the citizen participation process, the grantee will become more aware and sensitive to low-and moderate-income citizens needs and the needs of people with disabilities and the organizations representing persons with disabilities. It will also afford the Consortia an opportunity to better inform the public of the purpose of the CDBG, ESG and HOME grants and the funding allocation process, and ensure that selected projects are meeting the needs of the Consortia's constituents.

Prior to the solicitation and selection of the 2021 CD projects, a series of meetings were held. County staff met with representatives of municipalities, community-based organizations and housing-related agencies to encourage citizen participation in a series of countywide public forums. The meetings were also used to inform the public about the CDBG, HOME, and ESG programs, the type of projects eligible for funding, and the project selection process. Articles appeared in local and community newspapers informing the public about the county-wide forums and encouraging their participation. These forums for residents of the 37 municipalities were held on September 22, and September 23, for the purpose of receiving input from them on needs in human services, housing, community/neighborhood improvements and economic development. Within the 37 municipalities in the HOME Consortium, the low- and very- low-income population is not concentrated in one identifiable area. Due to the pandemic the forums were held virtually.

Most minorities living in the Consortia communities reside in the City of Lackawanna. Normally for in-person forums all sites are accessible for individuals with limited mobility. Special meetings and information for non-English speaking residents were available upon request. Interpretation services were available for meetings if requested in advance.

On February 4, 2021, the Coordinating Committee, with representatives of the Erie County CDBG Consortium Project Selection Committee, Lackawanna Community Development Corp., Lackawanna Public Housing Authority, People, Inc., Community Concern, Erie County Departments of Social Services, Senior Services, and Environment and Planning, and the Town of Hamburg represented by the Supervisor, met virtually to review the data gathered by the staff, issues and needs identified by residents, governmental agencies, and service providers along with the priorities, strategy and objectives established in the Year 2 Action Plan to address those needs.

The 34 municipalities that make up the Erie County Consortium are required annually to advertise and hold public hearings in their respective communities.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	Citizen Forum Virtual Call-In Meeting Due to Pandemic held on 09/22/2020. One person called in.	The caller requested information on the housing rehab program.	None	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Non-targeted/broad community	Citizen Forum Virtual Call-In Meeting Due to Pandemic held on 09/23/2020. One person called in.	The callers major concern was the lack of pedestrian safety elements on Pleasant Ave and William Street in the Town of Lancaster. Specifically said there needs to be sidewalks on both of these streets as there are connecting schools nearby and many people walking in the street or shoulder with unsafe conditions. Wants to see more pedestrian-focused infrastructure and not such a focus on automobile improvements.	None	

3	Public Meeting	Non-targeted/broad community	Each of the 34 municipalities that make up the Erie County Consortium held public hearings in their respective communities to obtain input from residents on community development needs.	<p>1. Housing Needs: A) More senior housing, especially affordable senior housing is needed in the rural and low-income areas of the consortium.</p> <p>2. Human Services Needs: A) Need for increased funding for transportation services in addition to the Rural Transit Services.</p> <p>3. Neighborhood/Community Development Needs: A) Need for community centers to be used for social gathering and for food pantries B) Need for park and playground equipment for outside activities for all community members C) Need for increased funding for deteriorated sidewalks and infrastructure in older low-income neighborhoods D) Need for increased funding for demolition of</p>	None	
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
				blighted, vacant buildings E) Need for increased funding for ADA projects.		
4	Newspaper Ad	Non-targeted/broad community	Notice of availability of the FY 2021 Action Plan for public review and comments was published in the Buffalo News on January 8 and the Buffalo Criterion on January 9, 2021.	No comments were received.	None	
5	Internet Outreach	Non-targeted/broad community	The FY 2021 Action Plan was posted on Erie County's website on January 8, 2021.	None	None	

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Public Comment Period	Non-targeted/broad community	The PY 2021 Action Plan was on public display from January 8 through February 10, 2021 on Erie County's website and at libraries throughout Erie County.	None	None	
7	Public Hearing	Non-targeted/broad community	Erie County held Virtual Call-In Public Hearings due to pandemic on January 26, 27 and 28 to present the 2021 Action Plan and received comments from the public.	Need for increased funding for housing rehab programs due to waiting list.	None	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,134,099	520,870	0	3,654,969	11,093,046	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	949,819	160,266	0	1,110,085	3,302,136	

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	241,876	0	0	241,876	718,350	
Other	public - federal	Other	0	0	0	0	0	

Table 2 - Expected Resources – Priority Table

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Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

In 2021, projects funded through Erie County's CDBG allocation leveraged \$3,449,881 in matching funds. It is anticipated that similar matching funds will be leveraged annually from 2020 – 2024.

The County is required to provide a match for federal funds received under the HOME Program. The County will continue to provide Payment in Lieu of Taxes for rental housing that is developed to serve low income households in Erie County. The difference between the full assessed value for property tax and the amount paid under the PILOT Payment Schedule will be used by the County for the HOME match.

Agencies receiving ESG funds under the County ESG Program will provide a portion of the required ESG match. The County will also use the financial assistance and services the County Department of Social Services provides to the homeless as a match.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Erie County, excluding the City of Buffalo, has over 16,043 vacant housing units. Many are eligible for foreclosure. The Buffalo Erie Niagara Land Improvement Corporation (BENLIC) is a resource to the Consortium in identifying units within the aforementioned parcel list that can undergo foreclosure, rehabilitation, and resale as affordable housing. This is a unique opportunity to partner with the newly formed land bank to leverage federal funds.

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Water/Sewer/Drainage Improvements CD-1.1	2020	2024	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$620,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2455 Persons Assisted
2	Sidewalk Improvements CD-1.2	2020	2024	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$48,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 71 Persons Assisted
3	Road Improvements CD-1.3	2020	2024	Non-Housing Community Development	City of Lackawanna - First Ward Target Area	Infrastructure (Community Development)	CDBG: \$310,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2365 Persons Assisted

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Building and ADA Improvements CD-2.1	2020	2024	Non-Housing Community Development		Public Facilities	CDBG: \$52,500	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1328 Persons Assisted
5	Senior Center Improvements CD-2.3	2020	2024	Non-Housing Community Development		Public Facilities	CDBG: \$149,069	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2291 Persons Assisted
6	Smart Growth Fund CD-2.5	2020	2024	Neighborhood Revitalization		Public Facilities	CDBG: \$333,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1200 Persons Assisted
7	Transportation CD-3.1	2020	2024	Non-Housing Community Development		Public Services	CDBG: \$322,662	Public service activities other than Low/Moderate Income Housing Benefit: 2187 Persons Assisted

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Fair Housing Services CD-3.2	2020	2024	Non-Housing Community Development		Public Services	CDBG: \$59,536	Public service activities other than Low/Moderate Income Housing Benefit: 1250 Persons Assisted
9	Administration CD-5.1	2020	2024	Administration		Planning/Administration	CDBG: \$626,819 HOME: \$94,981 ESG: \$18,140	
10	Owner Occ. Deferred Loan Program H-1.1	2020	2024	Affordable Housing		Housing Rehabilitation	CDBG: \$421,680 HOME: \$350,932	Homeowner Housing Rehabilitated: 33 Household Housing Unit
11	Owner Occ. Deferred Loan Prgm. Target Areas H-1.2	2020	2024	Affordable Housing	City of Lackawanna - First Ward Target Area Village of Depew- Main Street/Terrace Blvd. Target Area	Housing Rehabilitation	CDBG: \$195,132 HOME: \$143,061	Homeowner Housing Rehabilitated: 14 Household Housing Unit

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	Owner Occ. Deferred Loan Prgm T. West Seneca H-1.3	2020	2024	Affordable Housing		Housing Rehabilitation	CDBG: \$127,671 HOME: \$121,439	Homeowner Housing Rehabilitated: 12 Household Housing Unit
13	Owner Occ. Deferred Loan Prgm T. Hamburg H-1.4	2020	2024	Affordable Housing		Housing Rehabilitation	HOME: \$117,540	Homeowner Housing Rehabilitated: 6 Household Housing Unit
14	Emergency Repair Program H-1.5	2020	2024	Affordable Housing		Housing Rehabilitation	CDBG: \$175,000	Homeowner Housing Rehabilitated: 12 Household Housing Unit
15	Rental Rehabilitation Program H-1.6	2020	2024	Affordable Housing		Housing Rehabilitation	CDBG: \$138,000	Rental units rehabilitated: 10 Household Housing Unit
16	Mobile Home Repair Program H-1.7	2020	2024	Affordable Housing		Housing Rehabilitation	CDBG: \$76,000	Homeowner Housing Rehabilitated: 10 Household Housing Unit
17	Affordable Housing CHDO Projects H-2.1	2020	2024	Affordable Housing	City of Lackawanna - First Ward Target Area	Affordable Housing	HOME: \$282,132	Rental units constructed: 2 Household Housing Unit

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
18	Homeless Needs Rapid Re-Housing Program ESG-1.1	2020	2024	Homeless		Homeless Assistance	ESG: \$128,259	Tenant-based rental assistance / Rapid Rehousing: 30 Households Assisted
19	Homeless Needs Homeless Prevention Program ESG-1.2	2020	2024	Homeless		Homeless Assistance	ESG: \$85,477	Homelessness Prevention: 25 Persons Assisted
20	Homeless Needs Homeless Prevention Program ESG-1.3	2020	2024	Homeless		Homeless Assistance	ESG: \$10,000	Other: 1 Other

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Water/Sewer/Drainage Improvements CD-1.1
	Goal Description	Projects in the City of Tonawanda, Villages of North Collins and Alden and Town of Boston.
2	Goal Name	Sidewalk Improvements CD-1.2
	Goal Description	Project in the Town of Eden.
3	Goal Name	Road Improvements CD-1.3
	Goal Description	Projects in the City of Lackawanna and Village of Gowanda.
4	Goal Name	Public Building and ADA Improvements CD-2.1
	Goal Description	Project in the Village of Orchard Park.

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5	Goal Name	Senior Center Improvements CD-2.3
	Goal Description	Projects in the Towns of Newstead, Elma and Concord.
6	Goal Name	Smart Growth Fund CD-2.5
	Goal Description	Project in the Village of Springville.
7	Goal Name	Transportation CD-3.1
	Goal Description	Projects in the Town of Holland and the Southowns Rural Transit Service Program.
8	Goal Name	Fair Housing Services CD-3.2
	Goal Description	Fair Housing Services and Houseling Counseling Services provided by HOME and Belmont Shelter Corp.
9	Goal Name	Administration CD-5.1
	Goal Description	Program Administration costs associated with the CDBG, HOME and HESG grants.
10	Goal Name	Owner Occ. Deferred Loan Program H-1.1
	Goal Description	Housing rehab program- Consortium wide.
11	Goal Name	Owner Occ. Deferred Loan Prgm. Target Areas H-1.2
	Goal Description	Housing Rehab- Targeted Areas- City of Lackawanna and Village of Depew.
12	Goal Name	Owner Occ. Deferred Loan Prgm T. West Seneca H-1.3
	Goal Description	Housing Rehab Program- T. West Seneca.
13	Goal Name	Owner Occ. Deferred Loan Prgm T. Hamburg H-1.4
	Goal Description	Housing Rehab Program- T. of Hamburg.
14	Goal Name	Emergency Repair Program H-1.5
	Goal Description	Housing Rehab Porogram- Emergency Repair

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15	Goal Name	Rental Rehabilitation Program H-1.6
	Goal Description	Housing Rehab Program- Rental Rehab
16	Goal Name	Mobile Home Repair Program H-1.7
	Goal Description	Housing Rehab Program- Mobile Home Repair
17	Goal Name	Affordable Housing CHDO Projects H-2.1
	Goal Description	Affordable Housing Construction- Lackawanna
18	Goal Name	Homeless Needs Rapid Re-Housing Program ESG-1.1
	Goal Description	Emergency Solutions Homeless Assistance- Rapid Re-Housing
19	Goal Name	Homeless Needs Homeless Prevention Program ESG-1.2
	Goal Description	Emergency Solutions Homeless Assistance- Homeless Prevention
20	Goal Name	Homeless Needs Homeless Prevention Program ESG-1.3
	Goal Description	ESG- Data Colledction Services

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AP-35 Projects - 91.420, 91.220(d)

Introduction

The following project information for FY 2021 provides a comprehensive overview on the ranges of CDBG, HOME, and ESG activities.

#	Project Name
1	ADM21 - CDBG- Program Administration
2	ADM21 - HOME - Program Administration
3	HESG 21 - Rapid Re-Housing/Prevention/Data Collection/Admin
4	H21 - Fair Housing Opportunities Made Equal
5	H21- Housing Support Services - Housing Counseling - Belmont Shelter Corp
6	H21 - CDBG/HOME Consortium Owner Occupied Housing Rehab Program
7	H21 - CDBG/HOME Consortium Owner Occupied Housing Rehab Program - Targeted Areas
9	H21 - CDBG/HOME - West Seneca Housing Rehab Loan Program
10	H21 - Housing Rehabilitation - Town of Hamburg
11	H21 - Housing Rehabilitation - Emergency Repair Program
12	H21 - Housing Rehabilitation - Rental Rehabilitation Program
13	H21 - Housing Rehabilitation - Mobile Home Repair Program
14	H21 - HOME - CHDO Projects
15	ED21 - Smart Growth Initiative - V. Springville - Franklin Streetscape and Eaton Park Improvements
16	ED21 - C. Tonawanda - Sanitary Sewer Lining and Sewer Replacements
17	CP21 - C. Lackawanna - Center Street Complete Road Reconstruction
18	CP21 - V. Alden - Elm Street Drainage Improvements
19	CP21 - T. Eden - Green/Welch Sidewalk Replacement
20	CP21 - V. Gowanda- Municipal Parking Lot Repaving/Drainage Improvemnts
21	CP21 - T. Boston - Meadow Drive/Ripple Drive Waterline Replacement
22	CP21 - Rural Transit Services
23	CP21 O V. Orchard Park - ADA Curb Cut Improvements - Business District
24	CP21 - T. Holland - Senior Van Purchase
25	CP21 - V. North Collins -Park/ Harrison Waterline Installation
26	CP21 - T. Newstead - Senior Center Improvements - New LED Lighting
27	CP21 - T. Elma - Senior Center Improvements - New Floor Installation
28	CP21 - T. Concord - Senior Center Improvements - Parking Lot Repaving/Drainage

Table 4 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The service area for the Erie County/CDBG Consortium includes a total of 34 municipalities (population

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of approximately 312,000) which includes all of Erie County with the exception of the City of Buffalo and Towns of Amherst, Cheektowaga, Tonawanda and Hamburg for the CDBG program. Hamburg, with a total population of approximately 56,000, is a member of the HOME consortium not the CDBG consortium.

There is one census tract in the consortium that has a high minority population. It is located in the first ward neighborhood of the City of Lackawanna. The City of Lackawanna along with the City of Tonawanda also have the highest low-to moderate income populations within the consortium. There are a total of 55 income eligible block groups in the Consortium. There are eleven communities that do not contain any census eligible areas. Priority for funding projects is given to those low-income concentrated areas.

Neighborhoods included for housing rehabilitation priority in the Action Plan are the City of Lackawanna First Ward, Town of Evans – Lake Erie Beach, Village of Depew – Main Street/Terrace Boulevard area, City of Tonawanda- northeast and the Town of West Seneca- City of Buffalo border. Funding limitations hinder the ability to fund more community development and economic development projects. The housing program has the obstacle of such a large geographic area served, which makes targeting funds and showing major progress in a specific area difficult. This was the reason for increased housing rehabilitation targeting of funds in the noted areas.

2021 YEAR - CONSOLIDATED BUDGET SORTED

Project #	PROGRAMMED PROJECTS	HOME	CDBG-Admin	Emergency Solutions	Community Project	Economic Development	Housing-CDBG	Future/Program Income	Prior Year Funds	Other Funds	Total
1	ADM21- Program - Administration		\$ 626,819.00								\$ 626,819.00
2	HOME21 - Administration	\$ 94,981.00									\$ 94,981.00
3	ESG21 - Administration			\$ 18,140.00							\$ 18,140.00
4	H21 - Fair Housing- Housing Opportunities Made Equal						\$ 37,720.00				\$ 37,720.00
5	H21 - Housing Support Services - Housing Counseling - Belmont Shelter Corp.						\$ 21,716.00				\$ 21,716.00
6	H21 - CDBG/HOME Consortium Owner Occupied Housing Rehab Program						\$ 115,910.00	\$ 305,770.00			\$ 421,680.00
6	H21 - CDBG/HOME Consortium Owner Occupied Housing Rehab Program	\$ 249,566.00						\$ 101,366.00			\$ 350,932.00
7	H21 - CDBG/HOME Consortium Owner Occupied Housing Rehab Program- Targeted Areas						\$ 68,532.00	\$ 126,600.00			\$ 195,132.00
7	H21 - CDBG/HOME Consortium Owner Occupied Housing Rehab Program- Targeted Areas	\$ 106,661.00						\$ 36,400.00			\$ 143,061.00
9	H21 - CDBG/HOME West Seneca Housing Rehab Loan Program						\$ 39,171.00	\$ 88,500.00			\$ 127,671.00
9	H21 - CDBG/HOME- West Seneca Homeowner Rehab	\$ 98,939.00						\$ 22,500.00			\$ 121,439.00
10	HOME21 - Hamburg - Homeowner Rehab	\$ 117,540.00									\$ 117,540.00
11	H21 - Emergency Rehab Program						\$ 175,000.00				\$ 175,000.00
12	H21 - Rental Rehab Program						\$ 138,000.00				\$ 138,000.00
13	H21 - Mobile Home Repair Program						\$ 76,000.00				\$ 76,000.00
14	HOME21 - CHDO Projects	\$ 282,132.00							\$ -		\$ 282,132.00
15	ED21- Smart Growth Initiative - V. Springville- Franklin Street Streetscape and Eaton Park Improvements					\$ 333,000.00				\$ 127,910.00	\$ 460,910.00
16	ED21- C. Tonawanda - Sanitary Sewer Lining and Sewer Replacements - Grove and Minerva Streets					\$ 155,000.00				\$ 50,670.00	\$ 205,670.00
20	ED21 - V. Gowanda- Municipal Parking Lot Repaving/Drainage Improvements					\$ 155,000.00				\$ 193,950.00	\$ 348,950.00
17	CP21 - C. Lackawanna - Center Street Road Reconstruction Project				\$ 155,000.00					\$ 1,798,207.00	\$ 1,953,207.00
18	CP21- V. Alden- Elm Street Drainage Improvements				\$ 155,000.00					\$ 129,949.00	\$ 284,949.00
19	CP21 - T. Eden - Green/Welch Sidewalk Replacement				\$ 48,000.00					\$ 2,406.00	\$ 50,406.00
21	CP21 -T. Boston - Meadow Drive/Ripple Drive Waterline Replacement				\$ 155,000.00					\$ 226,279.00	\$ 381,279.00
22	CP21 - Rural Transit Service				\$ 283,500.00					\$ 648,000.00	\$ 931,500.00
23	CP21 -V. Orchard Park - ADA Curb Cut Improvements- Business District				\$ 52,500.00					\$ 5,420.00	\$ 57,920.00
24	CP21 -T. Holland - Senior Van Purchase				\$ 39,162.00					\$ 3,062.00	\$ 42,224.00
25	CP21 - V. North Collins - Park/Harrison Waterline Installation				\$ 155,000.00					\$ 222,350.00	\$ 377,350.00
26	CP21 - T. Newstead- Senior Center Improvements- New LED Lighting				\$ 33,329.00					\$ 1,676.00	\$ 35,005.00
27	CP21 - T. Elma- Senior Center Improvements- New Floor Installation				\$ 52,740.00					\$ 180.00	\$ 52,920.00
27	CP21 - T. Concord- Senior Center Improvemwents- Parking Lot Repaving/Drainage				\$ 63,000.00					\$ 39,822.24	\$ 102,822.24
3	ESG21- Rapid Re-Housing Rental Assistance			\$ 128,259.00						\$ 55,085.00	\$ 183,344.00
3	ESG21- Homeless Prevention Rental Assistance			\$ 85,477.00						\$ 55,085.00	\$ 140,562.00
3	ESG21- HMIS Data Collection			\$ 10,000.00						\$ 10,000.00	\$ 20,000.00
	TOTAL	\$ 949,819.00	\$ 626,819.00	\$ 241,876.00	\$ 1,192,231.00	\$ 643,000.00	\$ 672,049.00	\$ 681,136.00	\$ -	\$ 3,570,051.24	\$ 8,576,981.24
			\$ 3,134,099.00								

AP-38 Project Summary

Project Summary Information

1	Project Name	ADM21 - CDBG- Program Administration
	Target Area	
	Goals Supported	Administration CD-5.1
	Needs Addressed	Planning/Administration
	Funding	CDBG: \$626,819
	Description	Administrative funds for CDBG grant.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	
2	Planned Activities	Administrative Services.
	Project Name	ADM21 - HOME - Program Administration
	Target Area	
	Goals Supported	Administration CD-5.1
	Needs Addressed	Planning/Administration
	Funding	HOME: \$94,981
	Description	Administrative funds for HOME Grant.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
3	Location Description	
	Planned Activities	
3	Project Name	HESG 21 - Rapid Re-Housing/Prevention/Data Collection/Admin
	Target Area	

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	Goals Supported	Homeless Needs Rapid Re-Housing Program ESG-1.1 Homeless Needs Homeless Prevention Program ESG-1.2 Homeless Needs Homeless Prevention Program ESG-1.3
	Needs Addressed	Homeless Assistance
	Funding	ESG: \$241,876
	Description	
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	56 families assisted.
	Location Description	Funding for ESG Grant.
	Planned Activities	Homeless prevention/rapid re-housing services.
4	Project Name	H21 - Fair Housing Opportunities Made Equal
	Target Area	
	Goals Supported	Fair Housing Services CD-3.2
	Needs Addressed	Public Services
	Funding	CDBG: \$37,720
	Description	
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
5	Project Name	H21- Housing Support Services - Housing Counseling - Belmont Shelter Corp
	Target Area	
	Goals Supported	Fair Housing Services CD-3.2
	Needs Addressed	Public Services

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	Funding	CDBG: \$21,716
	Description	
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
6	Project Name	H21 - CDBG/HOME Consortium Owner Occupied Housing Rehab Program
	Target Area	
	Goals Supported	Owner Occ. Deferred Loan Program H-1.1
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$421,680 HOME: \$350,932
	Description	
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	35 low/moderate families assisted
	Location Description	Consortium wide housing rehab program.
	Planned Activities	Housing rehab services
7	Project Name	H21 - CDBG/HOME Consortium Owner Occupied Housing Rehab Program - Targeted Areas
	Target Area	City of Lackawanna - First Ward Target Area Village of Depew- Main Street/Terrace Blvd. Target Area
	Goals Supported	Owner Occ. Deferred Loan Program H-1.1
	Needs Addressed	Housing Rehabilitation

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	Funding	CDBG: \$195,132 HOME: \$143,061
	Description	
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	14 low/mod families assisted
	Location Description	Consortium wide housing rehab program.
	Planned Activities	Housing rehab
8	Project Name	H21 - CDBG/HOME - West Seneca Housing Rehab Loan Program
	Target Area	
	Goals Supported	Owner Occ. Deferred Loan Prgm T. West Seneca H-1.3
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$127,671 HOME: \$121,439
	Description	Housing rehab- T. West Seneca
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	12 low/mod families assisted
	Location Description	Town of West Seneca
	Planned Activities	Housing rehab.
9	Project Name	H21 - Housing Rehabilitation - Town of Hamburg
	Target Area	
	Goals Supported	Owner Occ. Deferred Loan Prgm T. Hamburg H-1.4
	Needs Addressed	Housing Rehabilitation
	Funding	HOME: \$117,540
	Description	
	Target Date	3/31/2022

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	Estimate the number and type of families that will benefit from the proposed activities	6 low/mod families assisted
	Location Description	Housing rehab program - Town of Hamburg
	Planned Activities	
10	Project Name	H21 - Housing Rehabilitation - Emergency Repair Program
	Target Area	
	Goals Supported	Emergency Repair Program H-1.5
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$175,000
	Description	
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	12 low/mod families assisted
	Location Description	Housing rehab program = emergency rehab.
	Planned Activities	
11	Project Name	H21 - Housing Rehabilitation - Rental Rehabilitation Program
	Target Area	
	Goals Supported	Rental Rehabilitation Program H-1.6
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$138,000
	Description	
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	10 low/mod families assisted

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	Location Description	Consortium wide
	Planned Activities	Housing rehab program - rental rehab
12	Project Name	H21 - Housing Rehabilitation - Mobile Home Repair Program
	Target Area	
	Goals Supported	Mobile Home Repair Program H-1.7
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$76,000
	Description	
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	10 very low income families assisted
	Location Description	Consortium wide.
	Planned Activities	Mobile home repair program
13	Project Name	H21 - HOME - CHDO Projects
	Target Area	City of Lackawanna - First Ward Target Area
	Goals Supported	Affordable Housing CHDO Projects H-2.1
	Needs Addressed	Affordable Housing
	Funding	HOME: \$282,132
	Description	
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	2 household housing unit
	Location Description	New construction of affordable projects funded through CHDO's in the City of Lackawanna (single family home construction) and the Village of Blasdel - senior housing - 46 units.
	Planned Activities	Affordable housing - new construction of 2 single family homes in the City of Lackawanna

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14	Project Name	ED21 - Smart Growth Initiative - V. Springville - Franklin Streetscape and Eaton Park Improvements
	Target Area	
	Goals Supported	Smart Growth Fund CD-2.5
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$333,000
	Description	Continuation of Village streetscapes improvements along Franklin Street and N. Central. Project to include pedestrian crosswalk improvements, pavement upgrades on N Central and park upgrades. This project included improvements to Eaton Park, which contains the Village spray park, tennis courts and Heritage Park, which includes the Village skate plex.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	1200 low to moderate income persons will be assisted
	Location Description	Franklin Street and Eaton Park, Village of Springville
	Planned Activities	Franklin Street Streetscape Phase III and Eaton Park Improvements
15	Project Name	ED21 - C. Tonawanda - Sanitary Sewer Lining and Sewer Replacements
	Target Area	
	Goals Supported	Water/Sewer/Drainage Improvements CD-1.1
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$155,000
	Description	Sanitary sewer lining project includes work on approximately 1,815 square feet of sanitary sewer on portions of both Minerva Street and Grove Street.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	570 low and moderate income persons to be assisted

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	Location Description	Grove St from south of Grove Pl. to Minerva St. and Minerva St between Grove St. and Main St., City of Tonawanda
	Planned Activities	Sewer lining on Grove and Minerva
16	Project Name	CP21 - C. Lackawanna - Center Street Complete Road Reconstruction
	Target Area	
	Goals Supported	Road Improvements CD-1.3
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$155,000
	Description	A total of 3,300 linear feet of roadway on Center Street from Ridge Road to Kirby Avenue will be completely rebuilt
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	1430 low and moderate income persons to be assisted
	Location Description	Center Street from Ridge Road to Kirby Avenue, Lackawanna
	Planned Activities	Complete road reconstruction of Center Street
17	Project Name	CP21 - V. Alden - Elm Street Drainage Improvements
	Target Area	
	Goals Supported	Water/Sewer/Drainage Improvements CD-1.1
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$155,000
	Description	Project will include replacing the existing storm sewer system, which only services the south portion of the street, install storm sewers on the north end, provide connections for each property along the street to be used for sump pump and gutter discharges, and install storm water treatment structures to remove debris and pollutants to improve the quality of storm water discharge.
	Target Date	3/31/2022

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2021

	Estimate the number and type of families that will benefit from the proposed activities	580 low and moderate income persons to be assisted
	Location Description	From 1468 Exchange Street to 1442 Exchange Street, Village of Alden
	Planned Activities	Drainage of Elm Street and Broadway/Exchange Street.
18	Project Name	CP21 - T. Eden - Green/Welch Sidewalk Replacement
	Target Area	
	Goals Supported	Sidewalk Improvements CD-1.2
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$48,000
	Description	850' of sidewalk repair and ADA compliance on Green street and 500; of sidewalk repair and ADA compliance on Welch Lane
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	71 low to moderate income persons to be assisted
	Location Description	Green Street between Depot St and Gowanda State Road; Welch Lane to Gowanda State Road
	Planned Activities	Green Street and Welch Lane Sidewalk Replacement and ADA Compliance.
19	Project Name	CP21 - V. Gowanda- Municipal Parking Lot Repaving/Drainage Improvemnts
	Target Area	
	Goals Supported	Road Improvements CD-1.3
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$155,000

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2021

	Description	Project consists of milling the surface of the Village Business Parking Lot and constructing a new asphalt top course and to replace the failing parking lot with full depth construction including geotextile fabric, stone base, asphalt binder and top courses. Areas will be regraded to direct storm water to drain structures. Sideway and driveway aprons will be reconstructed. The lot will be striped to define parking spaces, drive aisles and handicap accessible parking spaces
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	935 low to moderate income residents to be assisted
	Location Description	Parking lot directly behind the Main Street Business District between Center Street and North Water Street, Village of Gowanda
	Planned Activities	Business District Parking Lot Improvements
20	Project Name	CP21 - T. Boston - Meadow Drive/Ripple Drive Waterline Replacement
	Target Area	
	Goals Supported	Water/Sewer/Drainage Improvements CD-1.1
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$155,000
	Description	Construction of 1,145 linear feet of 12-inch water main will take place of the east side of Boston State Road and approximately four fire hydrants will be replaced.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	615 low-to-moderate residents will be assisted
	Location Description	Meadow Drive to Ripple Drive, Boston
	Planned Activities	Boston State Road Water Main Replacement
21	Project Name	CP21 - Rural Transit Services
	Target Area	

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2021

	Goals Supported	Transportation CD-3.1
	Needs Addressed	Public Services
	Funding	CDBG: \$283,500
	Description	Funding for transportation services for the low income and elderly population of 25 municipalities including the Towns of Aurora, Akron, Angola, Brant, Boston, Clarence, Colden, Collins, Concord, East Aurora, Eden, Elma, Evans, Farnham, Gowanda, Holland, Marilla, Newstead, North Collins, Orchard Park, Sardinia, Springville and Wales.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	1610 elderly and handicapped persons to be assisted
	Location Description	
	Planned Activities	Transportation services for low income residents and senior citizens in 25 municipalities.
22	Project Name	CP21 0 V. Orchard Park - ADA Curb Cut Improvements - Business District
	Target Area	
	Goals Supported	Sidewalk Improvements CD-1.2
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$52,500
	Description	Repair or replace debilitated ADA sidewalk ramps that hinder mobility for elderly and physically handicapped/impaired adults
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	1328 elderly and handicapped residents will be assisted

	Location Description	Streets included are East Quaker at Sunset Lane, Potter Ave at East Quaker St., North Buffalo St. at E/S Quaker St., North Buffalo St. at Princeton Pl., West Quaker St. at N/S Buffalo St., West Quaker St. at N/S Lincoln Ave., West Quaker St at N/S Davis, South Lincoln at West Quaker St., S Lincoln Ave at School St., S. Lincoln Ave at OP Middle School, S Buffalo St at Highland Ave
	Planned Activities	Repair or replace debilitated ADA sidewalk ramps
23	Project Name	CP21 - T. Holland - Senior Van Purchase
	Target Area	
	Goals Supported	Transportation CD-3.1
	Needs Addressed	Public Services
	Funding	CDBG: \$39,162
	Description	Purchase of van for the Town of Holland Senior Center to transport seniors to and from doctor's appointments, shopping for groceries and other necessary events
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	577 seniors will be assisted
	Location Description	Town of Holland Senior Center, 47 Pearl St, Holland
	Planned Activities	Purchase of van for Senior Center
24	Project Name	CP21 - V. North Collins -Park/ Harrison Waterline Installation
	Target Area	
	Goals Supported	Water/Sewer/Drainage Improvements CD-1.1
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$155,000

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	Description	Approximately 1,405 feet of existing 6" water line/repairs will be completely replaced with new 8" line and two additional valves to accommodate residents when repairs are required in the future. In addition, 460' of new 8" water line will be installed on Railroad Avenue creating a loop in the system and eliminating current dead end. Three fire hydrants will be upgraded allowing for more reliable for suppression when needed
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	690 low-to-moderate residents will be assisted
	Location Description	Replacement line starting at Sherman Ave/Park St going to Harrison joining new line to be installed on Railroad Avenue and extending back to Sherman Avenue.
	Planned Activities	Water Main Loop Project – Park/Harrison/Railroad
25	Project Name	CP21 - T. Newstead - Senior Center Improvements - New LED Lighting
	Target Area	
	Goals Supported	Senior Center Improvements CD-2.3
	Needs Addressed	Public Facilities
	Funding	CDBG: \$33,329
	Description	Fully renovate and replace existing bathroom fixtures for handicap accessibility, modern sanitary measures, privacy and energy efficiency improvements included battery operated flush valves, urinals and wall-hung lavs, touchless hand dryers, sinks and soap dispensers. A total of 6 new toilet stalls will be renovated and installed. The project will replace 84 antiquated lighting fixtures by upgrading the existing t-8 fluorescent lamps to LED lamps throughout the building.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	775 elderly and handicapped residents will be assisted
	Location Description	Newstead Senior Center, 5691 Cummings Road, Akron

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	Planned Activities	LED lighting and restroom upgrades for the Newstead Senior Center
26	Project Name	CP21 - T. Elma - Senior Center Improvements - New Floor Installation
	Target Area	
	Goals Supported	Senior Center Improvements CD-2.3
	Needs Addressed	Public Facilities
	Funding	CDBG: \$52,740
	Description	Project will include the removal of 6,700 sq. feet of flooring and replacing it with new wood-like vinyl composite tile. The stove will be removed and replaced with a brand-new commercial grade 60" 6-burner gas range with griddle and 2 standard ovens.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	108 elderly and handicapped persons to be assisted
	Location Description	Town of Elma Senior Center, 3007 Bowen Road, Elma
	Planned Activities	Town of Elma Senior Center Improvements
27	Project Name	CP21 - T. Concord - Senior Center Improvements - Parking Lot Repaving/Drainage
	Target Area	
	Goals Supported	Senior Center Improvements CD-2.3
	Needs Addressed	Public Facilities
	Funding	CDBG: \$63,000
	Description	Project will entail paving an area of about 54,200 sq. feet. The existing surface of packed millings will be cleaned and 100% tack coated. The lot will then be trued and leveled with #7 top 1 1/2" and rolled. A 1 1/2" #7 top and roll will also be installed. An average 2 1/2" top will be applied over the entire area.
	Target Date	3/31/2022

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	Estimate the number and type of families that will benefit from the proposed activities	1408 elderly and handicapped persons to be assisted
	Location Description	Town of Concord Senior Center, 40 Commerce Dr, Springville
	Planned Activities	Town of Concord Senior Center Parking Lot Paving

AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Reference should be made to Maps 3, 4, 5 and 6 that are located in ES-05 "Executive Summary" section of the Action Plan in the introduction. These describe the geographic areas within Erie County in which assistance will be directed in 2021. The titles are noted below:

- a) Map 3: CDBG Neighborhood Target Areas within Erie County
- b) Map 4: CDBG Eligible Block Groups
- c) Map 5: CDBG Census Tracts with Substantial Minority Population
- d) Map 6: CDBG Census Tracts with Substantial Low Income Population

It is estimated that 26% of all HOME and CDBG funds will be directed toward the target areas in 2021. This includes 22% of housing rehab monies as well as one economic development project.

Geographic Distribution

Target Area	Percentage of Funds
City of Lackawanna - First Ward Target Area	20
Village of Depew- Main Street/Terrace Blvd. Target Area	6

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The service area for the Erie County/CDBG Consortium includes a total of 34 municipalities (population of approximately 312,000) which includes all of Erie County with the exception of the City of Buffalo and Towns of Amherst, Cheektowaga, Tonawanda and Hamburg for the CDBG program. Hamburg, with a total population of approximately 56,000, is a member of the HOME consortium not the CDBG consortium.

There is one census tract in the consortium that has a high minority population. It is located in the first ward neighborhood of the City of Lackawanna. The City of Lackawanna along with the City of Tonawanda also have the highest low-to moderate income populations within the consortium. There are a total of 55 income eligible block groups in the Consortium. There are eleven communities that do not contain any census eligible areas. Priority for funding projects is given to those low-income

concentrated areas.

Neighborhoods included for housing rehabilitation priority in the Action Plan are the City of Lackawanna First Ward, Town of Evans – Lake Erie Beach, Village of Depew – Main Street/Terrace Boulevard area, City of Tonawanda- northeast and the Town of West Seneca- City of Buffalo border. Funding limitations hinder the ability to fund more community development and economic development projects. The housing program has the obstacle of such a large geographic area served, which makes targeting funds and showing major progress in a specific area difficult. This was the reason for increased housing rehabilitation targeting of funds in the noted areas.

Discussion

N/A

Affordable Housing

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

The Consortium will use HOME funds, ESG funds and a portion of CDBG funds for affordable housing. The HOME and CDBG funds will be used to rehabilitate existing housing units and the ESG funds will be allocated to rental assistance for the homeless and households at risk of homelessness. Low Income Housing Tax Credits will be used for rental housing, both new and rehab of existing units. The special-needs population will be served through the rehabilitation of existing structures for rental housing. Rental assistance will also be available through HUD Section 8 Vouchers which are administered by Belmont Housing Resources of Western New York. It is anticipated that there will be an increase in rental assistance through the ESG grant due to pandemic eviction moratoriums ending in the PY 2021 Year.

One Year Goals for the Number of Households to be Supported	
Homeless	35
Non-Homeless	42
Special-Needs	5
Total	82

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	85
The Production of New Units	2
Rehab of Existing Units	90
Acquisition of Existing Units	0
Total	177

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

Note that the “rental assistance” figure above reflects the annual goal for homeless persons participating in the Rapid Rehousing Prevention and Stabilization Program.

There is a great need for affordable housing in the Consortium communities. The following financial

assistance will be available to low income households in the Consortium:

- Zero interest deferred loans to homeowners to rehabilitate their homes.
- \$5,000 grant to mobile owners to rehabilitate their mobile home.
- Grants to individuals with a disability that need alterations to their structures to make it accessible.

Financial assistance to landlords to rehabilitate rental property for low income households

The production of new units will include two new single family homes constructed in the City of Lackawanna for low income families with the use of HOME CHDO funds.

AP-60 Public Housing - 91.420, 91.220(h)

Introduction

There are two public housing authorities within the Erie County Consortium; the Lackawanna Municipal Housing Authority (LMHA) and the Tonawanda Housing Authority (THA). The LMHA operates three federally-funded housing developments in the City of Lackawanna. The developments have a total of 490 units: 396 for families and 94 for senior citizens. There are a total of 264 units within the THA; 214 for families and 50 for senior citizens. It is important to note that the THA is state-funded rather than federally funded.

Actions planned during the next year to address the needs to public housing

The Lackawanna Municipal Housing Authority (LMHA) has two Educational Resource Centers and a Wellness Center on site. Many programs and services offered by the LMHA have been postponed due to Covid-19 protocols. When feasible again, the Educational Centers will be staffed, in conjunction with both Resident Councils, anywhere from 2-5 days a week. Various programs will again be offered including Cub Scouts, Girl Scouts, children's holiday parties and educational classes. The Wellness Center will also re-open Monday-Friday from 9am-1pm.

In 2020, the LMHA undertook projects at all 3 complexes. Highlights include re-caulking our 7 story Parkview Towers site, milling and repaving the parking lot at Glover Gardens, and replacing rain gutters on 2 buildings in the Baker Homes. The LMHA also continues to update its kitchens and bathrooms as needed.

LMHA continues to address the physical needs of its properties, while also focusing on the health of its residents and staff, in response to Covid-19. LMHA has provided PPE to both its residents and employees by passing out masks, gloves, and hand sanitizer. The LMHA allowed Lackawanna City School District to use both Community Centers to distribute lunches to its students as well as drop off and pick up homework assignments. The LMHA entered into a MOU with YWCA for the fall school semester, during which the Community Center on its Glover Garden's property was turned into a Virtual Learning Center during the week. This provided students with a place they could complete school assignments under adult supervision when they were not physically able to go to school.

LMHA also has plans for physical upgrades to its buildings and grounds in 2021. The Housing Authority plans to review how conventional gutters hold up over winter at its Baker Homes site, and will consider replacing them on the additional 22 buildings. The LMHA also has intentions of replacing the furnaces in all 125 units in Glover Gardens this year. Finally, the Authority will be doing extensive sidewalk repairs at

all 3 of its properties in the upcoming year.

The Tonawanda Housing Authority (THA) is currently in process of completing an IPNA (Physical Needs Analysis) of the property to create a 1, 3, 5, 10, and 15 year plan for the property. COVID-19 created a “void” in projects like roofing / parking lots and other structural improvements. The non-payment of rent and subsequent protections has created a gap in expenses and income. This will require tight spending in 2021 to survive as a Housing entity without some type of Government assistance.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Within the LMHA, the interests of tenants in management are met through two tenant members who sit on the Authority Board, as well as through two active tenant councils within the Glover Gardens and Baker Homes complexes. In conjunction with the Glover Garden’s Tenant Council, the LMHA has offered First Time Home Buyers courses to its tenants. The Tonawanda Housing Authority has two tenant representatives who sit on their Board of Directors. THA also encourages developing community involvement through Community Gardens and Senior/Youth social programs, much of which has been cancelled due to COVID-19 restrictions. Despite setbacks, THA is currently working with the City of Tonawanda to create a new Senior Activity Center in an underutilized Community Room currently used for storage.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A

Discussion

The two public housing authorities within the consortium continue to be at full rent up with waitlists. As of the writing of this plan, LMHC reported having greater than 100 applications on their waitlist, while THA reported only having 26 applications in total on their waitlist, the shortest in recent history. THA attributes their low waitlist numbers to people not wanting to move due to COVID-19 restrictions. Recent modernization improvements in both Authorities have helped to address physical deterioration, however; modernization improvements will continue to be important issues for both PHA’s due to the age of the structures.

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

The County, through its Department of Social Services, provides services to individuals and families that are homeless or at risk of becoming homeless. Case managers/examiners in the Homeless Unit are dedicated to assisting homeless persons with securing permanent housing as part of the Department's emergency services. The case managers assess the individual or family's needs and develop an independent living plan that includes housing and other supportive housing services required by homeless individuals and families to live independently, within the guidelines and requirements of NYS Regulation and Law.

The Department of Environment and Planning provides housing relocation and stabilization services to individuals and families that are homeless or at-risk of becoming homeless. Case managers provide individualized services to facilitate housing stability for program participants who are seeking permanent housing or at-risk of losing permanent housing.

The County, through the allocation of federal funds of the "Coronavirus Aid, Relief, and Economic Security Act" or the "CARES Act", provides services to prevent, prepare for, and respond to the COVID-19 pandemic among individuals and families who are homeless, at-risk of homelessness, and those economically impacted by the COVID-19 pandemic through child care services, housing stability services and rental/mortgage assistance.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

CoC homeless outreach teams search for unsheltered persons in Erie County. Erie County provides funding for Code Blue, the local winter shelter. Code Blue staff drive around to make sure people who are on the street or place not meant for human habitation to relocate to code blue shelters. In spring 2020, Code Blue shelters served as an additional shelter to prevent the spread of COVID-19 and decrease capacity at community congregate shelters. The CoC also has multiple coordinated entry locations throughout Erie County to ensure access to services for homeless families and individuals.

Erie County Department of Social Services will continue to support programs that help homeless persons, especially unsheltered persons and including the chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth. The programs include the Emergency Assistance to Adults, Emergency Assistance to Needy Families with Children and Emergency Safety Net Assistance. The programs provide financial assistance for shelter arrears, security agreements, water shutoff restore, heating equipment repair and replacement, home repairs, moving

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expenses and storage cost for furniture and personal belongings. These services will help homeless persons make the transition to permanent housing and independent living.

The Erie County Department of Mental Health contracts with Best Self Behavioral Health to fund an outreach team that is able to do street, hospital and shelter outreach for the homeless population which helps them get referred to housing. The team is also able to provide temporary diagnosis information in order to help clients get the correct level of care in which they need.

Addressing the emergency shelter and transitional housing needs of homeless persons

To address the needs of homeless persons needing emergency shelter and transitional housing the County will continue to provide emergency shelter that serve homeless persons in Erie County. The Erie County Department of Social Services will continue to assist clients through organizations that operate emergency shelters and transitional housing through shelter allowances for the homeless clients. The Department of Social Services contracts with 211 of WNY so individuals seeking emergency shelter have 24-hour access to services. As a result, there are no unsheltered families in Erie County. Emergency Shelters and Transitional Housing programs are using Coordinated Assessment system that the CoC developed to prioritize clients who are most in need and ensure clients are referred to the right program with the right level of care.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The County will continue to use federal funds received under the Emergency Solutions Grant Program for a Rapid Re-housing and Homelessness Prevention Program. The Program prevents individuals and families at risk of becoming homeless from becoming homeless and shortens the shelter stay for homeless individuals and families. The Program provides relocation and stabilization services to individuals and families that are homeless or at risk of becoming homeless. These services help homeless individuals and families make the transition from living in a shelter to permanent affordable housing. In order to stabilize program participants and prevent program participants from becoming homeless again, program participants are required to work with a case worker while receiving program services.

The County serves on the local Youth Task Force, organized by the local CoC, that focuses on bringing the community and young voices together to utilize federally awarded funds to end youth homelessness through a Coordinated Community Plan. Through this initiative, programs focusing on reducing youth homelessness, providing safe alternative to shelter for young people, and family reunification have

begun serving Erie County's vulnerable youth.

The Erie County Department of Mental Health prioritizes individuals that are chronically homeless and have a mental health disability for their permanent supportive housing beds. Both the ECDMH and Environment and Planning are using the Coordinated Assessment system that the CoC developed to prioritize clients who are most in need. Once a client is referred to a housing slot bed, they are able to work on goals that help them both assimilate to and achieve the transition from homelessness to more permanent housing lifestyle.

The County utilized CARES Act funding to help create virtual learning support centers (VLSC) for all 28 school districts. VLSC provides a safe and supervised setting for children ages 5 to 12 who are learning remotely and whose parents are working outside the home. VLSC is free of charge for parents earning less than 85 percent of the State Median Income and provides a childcare alternative while parents can either maintain or look for employment.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The County works with publicly funded institutions and systems of care such as healthcare facilities, mental health facilities, foster care and other youth facilities and corrections programs and institutions to ensure that low-income, especially extremely low-income individuals and families being discharged have housing and services required to avoid homelessness. If discharge services, including housing, are not provided by the publicly funded institutions, the Department of Social Services provides Rental Assistance in the form of Security Agreements and Back Rent payments, to eligible households using County funding. If DSS is not able to assist, the Department of Environment & Planning provides housing relocation, stabilization services and rental assistance to eligible individuals and families in order to prevent the individuals or families from becoming homeless.

In 2020, The Live Well Erie Emergency Housing Taskforce began a program to assist tenants, home owners, and landlords affected by the COVID-19 health pandemic. The Live Well Erie and City of Buffalo CARES Act Renters and Mortgage Assistance Program provided temporary rent and mortgage assistance to individuals who were unable to pay their rent or mortgage due to circumstances related to the pandemic.

In 2019, the County began Project Blue, an initiative partnering with community providers to reduce Erie County Holding Center recidivism through housing assistance, pre-and post-release support, peer mentoring, cognitive behavioral therapy, and off-site substance abuse and mental health treatment, job

training, and education. In 2020, the County opened the Service Link Stop, a program through the County's Mental Health Department that provides a central referral location for connecting people leaving Erie County Holding Center with housing services, mental health services, and other wrap-around services.

Discussion

The Erie County Department of Mental Health Single Point of Access (SPOA) for Housing has continued to coordinate services with various housing service providers in Western New York. This collaboration results in over 1800 slots of housing for individuals with Severe and Persistent Mental Illness in Erie County.

The Erie County Department of Mental Health, alongside Buffalo Psychiatric Center, ECMC and the Holding Center, collaborate to facilitate discharges and housing placement for high utilizers of institutional hospital settings. This is completed in collaboration with every level of mental health housing including community residences, treatment apartments, single room occupancies, and permanent supportive housing. The County facilitates weekly planning and case conferencing with the Buffalo Psychiatric Center in order to help place individuals in the correct level of care and with successful treatment plans.

The County has created a process to house people who are high utilizers of ECMC CPEP. The County also coordinates services with a New York State office of mental health housing project meant to facilitate the housing of people discharged from ECMC CPEP to facilitate their recovery. In addition, SPOA collaborates with the Continuum of Care Coordinated Entry process to facilitate housing placements of the highest need clients into ECDMH housing and into other housing. The Erie County Department of Mental Health also leads a county-wide taskforce to create more beds and facilitate access to housing that serves people with substance use disorder.

The ECDMH housing SPOA continues to coordinate services with a housing project administered through New York State Office of Mental Health, the Buffalo Psychiatric Center (BPC), and Recovery Options Made Easy. This initiative is focused on the discharge of individuals hospitalized in the BPC for greater than 6 months. The process involves multiple levels of housing designed to meet specific needs for individuals with challenging housing issues.

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

The County continues to address barriers of providing affordable housing for low and very low income households in the consortium communities. A new Analysis of Impediments to Fair Housing Choice study was completed in February of 2020. Barriers identified in the study include making housing affordable include public policies, limited resources and access.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The Erie County Consortium through the Erie County Department of Environment and Planning will continue to affirmatively further fair housing. In 2021, Erie County will incorporate barriers noted in the recent (AI) to Fair Housing report and work with Consortium Municipailties in addressing those barriers and work towards limiting them.

With the goal of strengthening fair housing enforcement activities throughout Erie County, the county will continue to serve on the Erie County Fair Housing Partnership board. In collaboration with the Partnership, Erie County adopted a local fair housing law in 2018 and will continue to work on implementing it in 2021.

Erie County DEP will continue to implement its Payment in Lieu of Taxes (PILOT) policy for affordable housing development by reviewing PILOT applications and assisting with the application approval process. PILOT agreements make affordable housing development and management feasible by allowing for a reduced payment, in lieu of paying the full taxes, when the units will be occupied by low and very low income tenants and will remain affordable throughout the terms of the PILOT agreement.

Discussion

N/A

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

Contingency Provision – It should be noted that any increase or decrease in funding to match actual allocation amounts will be applied to one or more specific activities indicated below.

a) CDBG Program

(1) Increase:

- Twenty percent of any increase will be applied to planning and administration.
- The balance will be applied to the Unprogrammed community projects listed in the order shown below:

1) V. Springville – \$150,000- N. Central Avenue- Waterline Replacement

2) C. Lackawanna – \$150,000- Center Street Curbing Replacement

3) T. West Seneca – \$150,000- Senior Center Improvements

4) T. Orchard Park- \$134,040– Senior Center ADA Improvements

5) V. Lancaster- \$150,000- Harold Place- Sanitary Sewer Replacement

6) T. Grand Island- \$150,000- Senior Center Improvements

(2) Decrease:

- Twenty percent of any decrease will be applied to the planning and administration project.
- The balance of any decrease will be applied to the CD Consortium Housing Rehab Program

Targeted, Developing, Rural.

b) HOME Investment Partnership

(1) Increase:

- Ten percent of any increase will be applied to the HOME Administration project.
- Fifteen percent will be applied to the Community Housing Development Opportunity set aside.
- The balance will be applied to the HOME Housing Rehab Consortium project.

(2) Decrease:

- Ten percent will be applied to the HOME Administration project.
- Fifteen percent will be applied to the Community Housing Development Opportunity set aside.
- The balance will be applied to the HOME Housing Rehab Consortium project.

c) Emergency Solutions Grant Program (ESG)

(1) Increase:

- 7.5 percent will be applied to the ESG Administration project.
- The balance will be applied to each remaining ESG project listed in section AP-35 of the Erie County Action Plan, with the increase for each reflecting the same percentage of the overall ESG allocation.

(2) Decrease:

- 7.5 percent will be applied to the ESG Administration project.
- The balance will be applied to each remaining ESG project listed in section AP-35 of the Erie County Action Plan, with the decrease for each reflecting the same percentage of the overall ESG allocation.

Actions planned to address obstacles to meeting underserved needs

1. The 5 year strategic plan clearly notes the need for additional rental housing for low and moderate income households within the consortium. New in 2020 will be the "Live Well Erie" *document* which is a health and human services action plan for Erie County government based on the idea that it is unacceptable for a newly revitalized Western New York to leave behind significant portions of our community when we can effect positive change in their lives.

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As such, the plan outlines specific measures that Erie County government will undertake to improve the quality of life for residents in need.

2. An "Analysis of Impediments to Fair Housing Choice" study is completed in draft form and will be completed in final version form in February of 2020. The study serves as the basis for fair housing planning in Erie County.

Actions planned to foster and maintain affordable housing

1. The Erie County Housing Policy and Procedures Manual will be updated in the 2021 program year. Key changes will include adjusting the maximum home value amounts for CDBG rental rehab cases. Updated numbers from HUD for the Erie County SMA area will be utilized.

Actions planned to reduce lead-based paint hazards

NYS Lead Based Paint Prevention Program

This is a core program funded by the State for identification and mitigation of elevated lead paint levels. This is a 5-year contract which is funded annually for \$500,000 to \$550,000 per year.

Elevated blood levels (EBL) in children is the most critical issue in dealing with lead-based paint. The State required the Erie County Department of Health to respond to all cases with elevated blood levels.

This involves case management with a nurse and follow-up referral to primary care physicians.

LEADS SAFE Erie County Lead Hazard Reduction Program

This program is funded through a grant from the U.S. Department of Housing and Urban Development. The current award of \$5.4 million began in January of 2020 and is scheduled to end in March of 2023, but delays caused by COVID-19 will likely lead to either an extension of program activities, or a reduction in benchmarks.

Homeowners must make a contribution towards the cost of mitigating lead-based paint hazards. Although they may have to pay up to a maximum of 12% to the total hazard control cost, in most instances the cost is \$150-250. On average about 75 units per year are assisted under this program, with 240 total expected interventions.

Although the program is available County-wide, about 75-80% of the grants are made to homeowners within high-risk ZIP code area. Homeowners must have an income which is below 80% of the median

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income of the area and have at least one child under age 6 living in the unit.

Erie County has also received a supplemental grant from HUD for \$600,000, to be utilized for non-lead housing-based hazards among the units treated for lead-based paint. Interventions will include items such as furnace repairs and upgrades, smoke and carbon monoxide detection equipment, moisture control, and mitigation of conditions likely to lead to slips, falls, or other household injuries.

Actions planned to reduce the number of poverty-level families

As identified in the Initiatives for a Stronger Community and Live Well Erie plans, Erie County will increase financial security and reduce poverty by supporting access to affordable housing. The following actions are being employed to reduce the number of poverty-level families in Erie County:

RENTAL REHABILITATION PROGRAM: ECDEP will increase the set aside within the CDBG Budget for the Rental Rehab Program to approximately \$138,000 for the 2021 program year. This will increase the number of rental units assisted.

RENTAL HOUSING INCENTIVE PROGRAM: Approximately \$282,132 in HOME funds was set aside in 2021. Although seemingly small, these dollars serve as a source of local matching money and help to leverage millions more. Nonprofit developers will use this money when applying for state and federal affordable housing dollars, making their projects more competitive. Priority will be given to family rental housing.

ERIE COUNTY FAIR HOUSING LAW: In 2018 the ECDEP and Department of Law completed a new Countywide Fair Housing Law. The law was passed in May of 2018 and ECDEP is administering the implementation of the law. Housing discrimination due to many factors ranging from lawful source of income to family type are important components of the law. Access to fair housing opportunities is a critical need for families struggling to eliminate all constraints to their financial security

Actions planned to develop institutional structure

1. The 2021 Program Year will mark the first year of a new 3 year cycle wherein all 37 members of the HOME consortium have an approved three year renewable agreement with Erie County.
2. The continued reasonableness of the existing percentage allocation formula for distribution of CDBG funds among housing, community revitalization, and economic development will be reviewed as the 2020 program year progresses.
3. In August of 2020 a new 3 year cycle was approved by HUD.

Actions planned to enhance coordination between public and private housing and social service agencies

1. Erie County will expand the current CDBG Coordinating Committee to insure better representation by social service agencies. An evaluation of the Housing Working Group formed as part of the One Region Forward initiative will occur. This membership roster will provide a useful resource for additional representation on the coordinating committee from public and private housing groups.
2. Erie County is preparing a comprehensive blueprint for carrying out human service programs. The CDBG grant and resources available through it will be incorporated into the document. This will aid in ongoing coordination between CDBG and DSS activities.

Discussion

N/A

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

The CDBG Program will continue to generally utilize the fund distribution policy established by the Consortium in prior years (i.e. 27% Community Revitalization, 27% Housing, and 27% Economic Development). HOME Funds will be used for Homeowner Rehab, new construction of affordable housing and very minimal Homebuyer programs. Emergency Shelter activities will remain focused on rapid rehousing and homeless prevention efforts.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0.00%

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**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Erie County will use HOME funds as specified in section 92.205. This primarily includes grants, and non-interest bearing loans. No other forms of HOME investment will be utilized in 2021 Program Year.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

See attached HOME Recapture Guidelines below (attached).

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Reference should be made to the HOME fund recapture policy noted in the response to AP90(2) above.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

HOME funds will not be used to refinance existing loans, thus this Section is not applicable to the Erie County Action Plan.

Emergency Solutions Grant (ESG)

1. Include written standards for providing ESG assistance (may include as attachment)
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Buffalo, Niagara Falls, Niagara and Erie County CoC developed and launched a Coordinated Assessment System in 2015, now the Buffalo/Niagara Falls, Erie, Niagara, Genesee, Orleans and Wyoming CoC. All HUD funded agencies, including CoC and ESG, are using the assessment system. Clients can access Coordinated Entry through coordinated entry hubs, shelters, street outreach

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teams or community partners, e.g. hospital discharge planner.

The system uses a set of coordinated entry assessment tools (Vulnerability Index and Service Prioritization Decision Assistance Tool developed by OrdCode) across the entire CoC to triage clients and prioritized those who are most in need. The Homeless Management Information System (HMIS) is used by the CoC to manage coordinated entry priority list.

The coordinated assessment tool is used to determine a potential program participant's eligibility for assistance for Rapid Re-housing (RRH) or Homelessness Prevention (HP). The coordinated assessment tool is available in HMIS, and all ESG program staff has been trained in HMIS and using the coordinated assessment tool or taking referrals through HMIS.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The County allocates ESG funds it receives from HUD through a Request for Proposal (RFP) process. Erie County issued an RFP in August, 2017 for HMIS services and Housing Relocation and Stabilization Services. The ESG RFP was advertised in the legal notices section of a local newspaper and a minority-owned newspaper. Not for profit organizations that provide services to persons that are homeless or at risk of becoming homeless were notified. The RFP included the ESG Program's requirements and an Erie County ESG Proposal Guide. Agencies interested in receiving ESG funds from the County's allocation were invited to an informational meeting that explained the Program requirements and the RFP process. Applications received by the County for ESG funds were reviewed by a committee. One proposal was received for HMIS services and six proposals were received for Housing Relocation and Stabilization Services. The committee considered the following factors when scoring proposals: quality of work with existing nonprofits; expertise; and, expenditure performance. The proposals were ranked and recommendations were made on which agencies to fund.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

County shall accomplish this requirement by working closely with the Subrecipient contracted to provide ESG services. This nonprofit has formerly homeless individuals on staff who will be consulted and will provide input as we update the policies & procedures for the program.

5. Describe performance standards for evaluating ESG.

The following performance standards for Rapid Rehousing (RRH) and Homeless Prevention (HP) were developed after meeting with Buffalo, Niagara Falls, Erie and Niagara County CoC:

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- 80% exit to permanent housing situation
- 54% or more of adult participants will have income from sources other than employment
- 40% or more of adult participants will increase income from sources other than employment
- 56% or more of all participants have mainstream (non-cash) benefits at exit from program
- 20% or more of adult participants have employment income
- 20% or more of adult participants increase employment income
- Less than 30 days from program entry to move into permanent housing
- At least 85% of the households that exited a rapid rehousing program to permanent housing should not become homeless again within a year

HOME- Recapture Guidelines

Recapture Requirements: In the event the homeowners transfer ownership of the residence within 5 or less years of the date the homeowner receives the Erie County HOME Assistance, Erie County and the homeowners shall share in the net proceeds from the sale.

Definitions:

HOME Assistance: HOME funds are invested in a HOME assisted unit, as a direct subsidy to the homebuyer. This includes down payment and closing cost assistance, and second mortgages that finance the difference between fair market value and the homebuyer's first mortgage.

Homeowner Investment in House: Homeowner share of required downpayment on the HOME assisted house and any major capital improvements done to the house that are documented by receipts.

Net Proceeds from Selling the House: This is sales price minus repayment of any non-HOME loan balance and closing costs financed by the homeowner.

HOME Recapture: Amount owed Erie County.

Formula:

Example: Mr. and Mrs. Smith purchased a house in February of 2005 using HOME monies through the Erie County First Time Home Buyer Program. The purchase price was \$50,000. Erie County provided a \$6,000 loan toward closing costs and principal reduction on the primary mortgage. The Smiths contributed \$500 toward the required downpayment, \$0 toward closing costs, and obtained a bank mortgage of \$48,000 for the house. The Smiths purchased 4 new windows for \$1,000 and retained receipts for said purchase.

After living in the house for 3 years, the Smiths sold their home for \$55,000. There was 2 years remaining on the County required 5-year affordability period, and a principal balance of \$47,000 on their primary bank mortgage.

The Smiths are required to repay Erie County the net proceeds from the sale as calculated below.

HOME Assistance (\$6,000)	X	Net Proceeds (\$55,000 - \$47,000)	=	HOME Recapture
HOME Assistance (\$6,000) + Homeowner Investment (\$1,000 for windows and \$500 for initial downpayment)		\$6,000 X \$8,000 = \$6,400 Owed to Erie County \$7,500		

ESG- Standards- 1

A. Introduction

Erie County will continue to provide assistance to individuals and families that are homeless or at risk of becoming homeless through the use of Federal funds received by the County under the Emergency Solutions Grant Program (ESG). The County will continue to provide permanent housing to individuals and families that meet HUD definition of homeless and to very low income families at risk of becoming homeless.

The Program will consist of both the Rapid Re-housing and Homelessness Prevention components of the ESG Program. Housing relocation and stabilization services as well as financial assistance will be available to program participants. The County will contract with not-for-profit agencies that serve the homeless population to implement the Program and oversee the HMIS component of the program.

ESG- Standards-2

Evaluation of individuals' and families' eligibility for assistance

All program participants for the ESG Program must meet HUD definition for homelessness or at risk of homelessness. To determine eligibility for the program all potential program participants will be evaluated by intake staff or case managers using the Continuum Wide coordinated Entry Assessment Tool. The staff will determine the potential program participant's eligibility for assistance, type of assistance. The coordinated entry assessment form is completed within 5 days of intake/case manager at shelter. The Coordinated Entry Lead will then make referral to Rapid Rehousing based on their income, Vulnerability, Homeless history, Domestic violence status, household composition, and program availability.

The following is the criteria the client must meet in order to be eligible for homelessness prevention and rapid re-housing assistance:

HOMELESSNESS PREVENTION ASSISTANCE

The program participants must provide proof of residency in one of the Erie County CDBG Consortium communities.

Program participants must provide proof of income. Total household income must be below 30 percent of the area median income.

All program participants must meet the following HUD criteria for defining at risk of homelessness for individuals or families, unaccompanied children, youth, or families with children and youths where youths are defined as up to age 25:

Individual or family who will imminently lose their primary nighttime residence, provided that:

- (I) Residence will be lost within 14 days of the date of application for ESG Program:
- (ii) No subsequent residence has been identified; and
- (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing

Any individual or family who:

- (i) Is fleeing, or is attempting to flee, domestic violence;
- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks to obtain other permanent housing

RAPID RE-HOUSING ASSISTANCE

The program participants must reside in a homeless shelter or hotel/ motel paid for by Erie County Department of Social Services or other locations that meet HUD definition for homeless. The County will give priority to homeless individuals and families that meet HUD homeless definition and reside in the Erie County CDBG Consortium but, since there are no publicly or privately operated shelters in the Erie

County CDBG Consortium, the County will also recruit program participants from designated homeless shelters in Buffalo, New York.

Individuals or family who lacks a fixed, regular, and adequate nighttime residence,

- (i) Has a primary nighttime residence that is a public or private place not meant for human habitation;
- (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelter, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Fleeing/Attempting to flee domestic violence and the individual or family meet the above requirements.

ESG- Standards-3

Coordinating Services

Coordination services among other providers

Subrecipient staff participating in the County ESG Program will be required to become familiar with other agencies that provide services under the Buffalo/Erie County Continuum of Care (CoC) and make referrals when necessary. At intake, staff will be required to use the Coe common assessment tool to record program participant's personal data. The common assessment tool information will be recorded in the HMIS database which can be shared with other agencies that are part of the ESG Program. Staff will use the HMIS to refer program participants to other agencies that provide homeless assistance services. Staff will also accept referrals from other agencies that are part of the Coe.

The County will notify other homeless assistance providers of the services that will be available through the Erie County ESG Program. Subrecipient staff will be required to work directly with emergency shelter providers for referral for the Rapid Re-housing component of the Program. Staff will be on site at emergency shelters to interview potential program participants.

Mainstream Service and Housing Providers

The County, along with the Homeless Alliance of Western New York and Subrecipients for the County ESG Program, will meet with other mainstream service and housing providers to coordinate and integrate to the maximum extent practicable ESG funded activities. The County does not want to use ESG funds to duplicate activities that are already funded by the County or other agencies. The Subrecipient will be required to use the services of other mainstream service and housing providers when providing assistance to clients.

ESG- Standards-4

Prioritizing Individuals and Families for Assistance

Based on the housing needs of the homeless population in Erie County which is documented in the Buffalo/ Erie County Continuum of Care and overseen by the Homeless Alliance of Western New York, the County ESG program will continue to coordinate with the CoC to ensure that the needs of the homeless population in Erie County are met. Erie County's program will continue to prioritize individuals and families who resided in the CDBG consortium prior to entering a shelter. Priority is given to clients that have the longest homeless history and score higher on the Coordinated Entry Assessment.

Rapid Re-housing

The County, Homeless Alliance of WNY and service providers for the homeless developed a list of barriers to obtaining and retaining housing to prioritize individuals and families that will receive assistance under the Rapid Re-housing component of the County ESG Program. Potential participants must meet HUD homeless definition.

Homelessness Prevention

The County, Homeless Alliance of WNY and service providers for the homeless developed a list of barriers to obtaining housing and retaining housing in order to prioritize individuals and families that will receive assistance under the Homelessness Prevention component of the County ESG Program. Potential participants must reside in the Erie County CDBG Consortium and meet HUD homelessness definition, must have an income less than 30% of the area median income, and must have at least 3 other barriers to obtaining housing and at least 3 barriers (other than economic) to retaining housing.

Participant Share for Rent and Utilities Costs

Upon entering the program, staff will ensure the rent is reasonable and will immediately start working with the program participant to obtain or confirm a source of income. The Case Manager will work to develop an individualized plan for each program participant to become stably housed. The plan will include a schedule for the participant to pay a portion of their rent and utilities, typically starting at 0%-30% and gradually increasing until the participant is paying the full amount of rent and utilities. Program participants will pay their share directly to the landlord and utility provider. The duration of assistance will depend on the household with a goal of 6 months of assistance and will not exceed 24 months.

ESG- Standards- 5

Duration of Assistance

The objective of the County ESG Program is to ensure program participants are stably housed before exiting the Program. Case managers will be required to develop a housing plan for each program participant on entering the Program. The housing plan will be tailored to the participant housing needs, but must address housing search, placement and sustainability. The case managers will review the housing plans monthly with the program participants and update the plans as needed. When it is determined the program participant is stably housed, the case manager will exit the client from the program. No participants will receive assistance for more than 24 months during a three year period.

Housing Stabilization and/or Relocation Services

As part of the County ESG Program Subrecipient case managers will be required to develop a housing plan for each program participant. The housing plan shall include the type and amount of housing stabilization and/or relocation services program participants will require in order to become stably housed. The services may include financial assistance costs, services costs, mediation, legal services and credit repair.

The services provided to program participants under financial assistance will include short and medium term rental assistance, rental application fees, security deposits, last month rent, utility deposits, utility payments and moving costs. The duration of these services will be determined by the case managers based on the progress the program participant is making to become stably housed. The maximum number of months a program participant may receive financial assistance and/or services is 24 months during a 3 year period.

Attachments

Citizen Participation Comments

CDBG PUBLIC MEETING COMMENTS

September 2020 – February 2021

1. Village of Depew

Pastor Hurley spoke at the Public Hearing and explained her thoughts on using the CDBG funds to renovate the Dom Pulski building in the Community Center. All of the Depew residents would be able to utilize this new facility for gatherings, social visits, use it for the food pantry, etc. And it is within walking distance for many of the residents in Depew. Mathew's Table and Tri-Community Food Pantry would also be able to be held in this new community center. Tom Sweeny who is part of the developing team and told everyone that the building is old, but structurally sound.

2. Village of North Collins

Mr. Trzesniewski expressed the wish for more outdoor activities for children and teenagers. Suggested tennis courts if possible or a skate park. Would be very good if they didn't have their children to go to other communities or outside the village to enjoy outdoor activities.

3. Town of West Seneca

A member of West Seneca Bikes proposed using the money to build a paved ramp track at the Harlem Road Park.

A resident commented that great improvements at Dirksen Avenue and Harlem Road Park have been made and requested continued improvements for the residents in this area.

A resident commented that children in these neighborhoods have a great need for accessible recreation opportunities especially basketball courts.

A resident requested Dwyer Street be paved as the streets around it have been. Supervisor Dickson stated that Dwyer Street is outside the designated area eligible for CDBG grant money.

4. Town of Evans

Ed Schneider of Redwing Street recommended that new playground equipment be installed at Lake Erie Beach Park.

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Grantee SF-424's and Certification(s)

OMB Number: 4040-0394
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424		
*1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
*2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
*3. Date Received: 03/12/2021		
*4. Applicant Identifier:		
5a. Federal Entity Identifier: 03-001-00-000		
5b. Federal Award Identifier:		
6. State Use Only:		
6a. Date Received by State:		
7. State Application Identifier:		
8. APPLICANT INFORMATION:		
*a. Legal Name: Erie County		
*b. Employer/Taxpayer Identification Number (EIN/TIN): 16-8635488		
*c. Organization's CUS: 27-015000000		
d. Address:		
* Street: 65 Klockner Street		
* Street2:		
* City: Buffalo		
* County/Parish:		
* State: NY, New York		
* Province:		
* Country: USA: UNITED STATES		
* Zip/Postal Code: 14201-3901		
e. Organizational Unit:		
Department Name: Environment and Planning		
Division Name: Community Development		
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr. * First Name: Paul		
Middle Name:		
Last Name: Lombardi		
Suffix:		
Title: Principal Contract Monitor		
Organizational Affiliation:		
* Telephone Number: 716-258-2100 Fax Number: 716-258-7200		
* Email: paul.lombardi@erie.gov		

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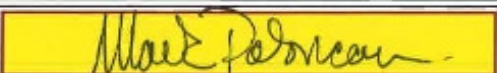
Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="B: County Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.218"/>	
CFDA Title <input type="text" value="Community Development Block Grant"/>	
* 12. Funding Opportunity Number: <input type="text"/>	
* Title: <input type="text"/>	
13. Competition Identification Number: <input type="text"/>	
Title <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
* 15. Description Title of Applicant's Project: <input type="text" value="This program funds fees for infrastructure improvements, economic development and housing rehabilitation assistance in low income areas of the Brazos County Consortium."/>	
Attach supporting documents as specified in agency requirements <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="HAWAII"/>	* b. Program/Project: <input type="text" value="0104"/>
Attach an additional list of Program/Project Congressional Districts if needed. <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Cancel Attachment"/> <input type="button" value="View Attachments"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="11/01/2021"/>	* b. End Date: <input type="text" value="03/31/2022"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="3,150,000.00"/>
* a. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="500,000.00"/>
* g. TOTAL	<input type="text" value="3,650,000.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12872 Process? <input checked="" type="checkbox"/> a. This application was made available in the State under the Executive Order 12872 Process for review on <input type="text" value="11/15/2021"/> <input type="checkbox"/> b. Program is subject to E.O. 12872 but has not been selected by the State for review <input type="checkbox"/> c. Program is not covered by E.O. 12872.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No * "Yes", provide explanation and attach <input type="text"/> <input type="button" value="See Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties (U.S. Code, Title 28, Section 1091) <input checked="" type="checkbox"/> I AGREE * The list of certifications and assurances, or an instruction where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Print: <input type="text" value="Mr."/> * First Name: <input type="text" value="Mark"/>	
Middle Name: <input type="text" value="C."/> Last Name: <input type="text" value="Dolan"/>	
Suffix: <input type="text" value=""/>	
* Title: <input type="text" value="County Executive"/>	
* Telephone Number: <input type="text" value="808-538-1000"/>	* Fax Number: <input type="text" value=""/>
* Email: <input type="text" value="mark@dolan.hawaii.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="03/23/2021"/>

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Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Pre-application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
* 3. Revision, select appropriate letter(s): <input type="checkbox"/> Other (Specify):		
* 3. Date Received: 09/12/2019		
4. Applicant Identifier:		
5a. Federal Entity Identifier: H-21-00-35 C9C1		5b. Federal Award Identifier:
State Use Only		
6. Date Received by State:		7. State Application Identifier:
8. APPLICANT INFORMATION:		
* a. Legal Name: Erie County		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 16-6302158		* c. Organizational DUNS: 01147296300
d. Address:		
* Street1: 55 Franklin Street		
Street2:		
* City: Buffalo		
County/Parish:		
* State: NY: New York		
Province:		
* Country: USA: United States		
* Zip/Postal Code: 14202-3067		
e. Organizational Unit:		
Department Name: Environment and Planning		Division Name: Community Development
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr. * First Name: Paul		
Middle Name: J.		
* Last Name: D'Onofrio		
Suffix:		
Title: Principal Contract Monitor		
Organizational Affiliation:		
* Telephone Number: 716-263-2194 Fax Number: 716-263-2700		
* Email: paul.d.onofrio@erie.gov		

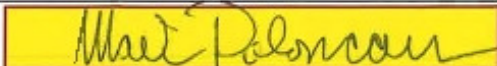
Application for Federal Assistance SF-424	
* 9. Type of Apolcard 1: Select Applicant Type: <input type="text" value="B: County Government"/>	
Type of Apolcard 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Department of Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.219"/>	
CFDA Title: <input type="text" value="HOME Investment Partnerships Program"/>	
* 12. Funding Opportunity Number: <input type="text"/>	
Title: <input type="text"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
* 16. Descriptive Title of Applicant's Project: <input type="text" value="HOME program funding used for housing rehabilitation and related activities for low income residents of the Erie County Community"/>	
Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance 6F-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="062734"/>	* b. Program/Project: <input type="text" value="0640"/>
Attach an additional list of Program/Project Congressional Districts, if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Close Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="1/1/2021"/>	* b. End Date: <input type="text" value="12/31/2021"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="930,816.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="930,816.00"/>
19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input checked="" type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text" value="07/15/2021"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review	
<input type="checkbox"/> c. Program is not covered by E.O. 12372	
20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes," provide explanation and attach	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if accepted award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1461)	
<input checked="" type="checkbox"/> -- I AGREE	
** The list of certifications and assurances, or if internet where you may obtain this list, is contained in the announcement or agency specific instructions	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Mark"/>
Middle Name: <input type="text" value="E."/>	
* Last Name: <input type="text" value="Poloncarz"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="County Executive"/>	
* Telephone Number: <input type="text" value="716-858-8500"/>	Fax Number: <input type="text"/>
* E-Mail: <input type="text" value="mark.poloncarz@poloncarz.com"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="7/15/2021"/>

Annual Action Plan
2021

Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: * If Revision, select appropriate identifier: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision * Other (Specify):	
* 3. Date Received: 3/17/2020		4. Applicant Identifier:	
5a. Federal Entity Identifier: E-21-02-15-0001		5b. Federal Award Identifier:	
State Use Only:			
6. Date Received by State:		7. State Application Identifier:	
B. APPLICANT INFORMATION:			
* a. Legal Name: Erie County			
* c. Employer/Taxpayer Identification Number (EIN/TIN): 15-6092553		* e. Organizational DUNS: 0704790890000	
d. Address:			
* Street:	25 Center Street		
* Street:			
* City:	Juchita		
* County/Parish:			
* State:	NY New York		
* Province:			
* Country:	USA: UNITED STATES		
* Zip/Postal Code:	12202-1967		
a. Organizational Unit:			
Department Name: Environmental and Planning		Division Name: Community Development	
f. Name and contact information of person to be contacted on matters involving this application:			
* Prefix:	Mr.	* First Name:	Paul
* Middle Name:	C.		
* Last Name:	Mondoux		
* Suffix:			
Title: Principal Contact Mondoux			
Organizational Affiliation:			
* Telephone Number: 716-838-7164		* Fax Number: 716-838-7147	
* Email: paul.mondoux@erie.gov			

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="County Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Department of Labor, Employment"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.122"/>	
CFA Title: <input type="text" value="Emergency Solutions Grant Program"/>	
* 12. Funding Opportunity Number: <input type="text"/>	
* Title: <input type="text"/>	
13. Competition Identification Number: <input type="text"/>	
* Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="886 Budget Items used for assistance for the homeless population of the Spokane County. Assistance includes housing, nutrition, mental health and medical services."/>	
Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional District(s) Of:	
* a. Applicant: <input type="text" value="P17709"/>	* b. Program/Project: <input type="text" value="E31"/>
Attach an additional list of Program/Project Congressional Districts, if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Download Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="04/01/2021"/>	* b. End Date: <input type="text" value="03/31/2022"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="200,000.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value="200,000.00"/>
* e. Other	<input type="text" value=""/>
** Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="400,000.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12872 Process? <input checked="" type="checkbox"/> a. This application was made available to the State under the Executive Order 12872 Process for review on <input type="text" value="04/01/2021"/> <input type="checkbox"/> b. Program is subject to E.O. 12872 but has not been selected by the State for review. <input type="checkbox"/> c. Program is not covered by E.O. 12872	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," provide explanation and attach: <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Download Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001) <input checked="" type="checkbox"/> ** I AGREE ** The list of certifications and assurances or an internal site where you may obtain this list is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Print: Mr. <input type="text"/>	* First Name: <input type="text" value="Mark"/>
Middle Name: <input type="text" value="C."/>	
* Last Name: <input type="text" value="Poloncar"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="County Executive"/>	
* Telephone Number: <input type="text" value="716-858-8500"/>	Alt Number: <input type="text"/>
* Email: <input type="text" value="mark.poloncar@polk-county.org"/>	
* Signature of Author and Representative: 	* Date Signed: <input type="text" value="04/01/2021"/>

Annual Action Plan
2021

Attachment to SF-424 Form CDBG Program

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4340-0008
Expiration Date: 03/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0341-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the out-of-pocket share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will return the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the completed work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OMB's Standards for a Merit System of Personnel Administration (50 C.F.R. 900, Subpart -).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title V of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686) which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794) which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107) which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1972 (P.L. 92-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§293a-3 and 293e-3), as amended relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.


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Standard Form 424D (Rev. 7-87)
Prescribed by OMB Circular A-109

Annual Action Plan
2021

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1506 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 48 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurance construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) Institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11890; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 108 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1998 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipients from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	County Executive
APPLICANT ORGANIZATION	DATE SUBMITTED
State County, New York	01/14/2021

SF-424D (Rev. 7-87) Back

Attachment to SF-424 Form HOME Program

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0005
Expiration Date: 09/30/2029

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (3548-0162), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using the positions for a purpose that constitutes or presents the appearance of persons or organizations conflict of interest or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart H).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title V of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686) which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101 & 6107) which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1972 (42 U.S.C. §§290c(d)(3) and 290c-3), as amended, relating to certification of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

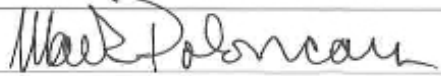
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Standard Form 424 (Rev. 7/97)
Prescribed by GSA Circular A-109

Annual Action Plan
2021

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 1324-1326) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Cope and Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1601 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic river system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§489a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1986 and OMB Circular No. A-133 "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7101) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	NTLC County of Sullivan
APPLICANT ORGANIZATION Otsego County, New York	DATE SUBMITTED 03/12/2021

SI-424D (Rev. 7-97) Back

Annual Action Plan 2021

Attachment to SF-424 Form ESG Program

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4341-0099
Expiration Date: 06/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0047), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not expose, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4720-4763) relating to prescribed standards of merit systems for programs funded under one of the 15 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §5401 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683 and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to non-discrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended relating to non-discrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290dd-3 and 290dd-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to non-discrimination in the sale, rental or financing of housing; (i) any other Federal or state laws or regulations which may apply to the particular project.

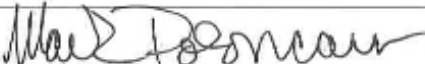
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Prescribed by OMB Circular A-102

Annual Action Plan
2021

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced, or whose property is acquired as a result of Federal and federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1506 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and installation is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11736; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (documentation and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§160a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section "06(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE County Executive
APPLICANT ORGANIZATION REIA County, New York	DATE SUBMITTED 03/12/2021

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CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-113, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.


Signature/Authorized Official 03/12/2021
Date

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2019, 2020, and 2021 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

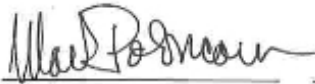
jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and any existing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.



Signature/Authorized Official

03/12/2021

Date

Erie County Executive

Title

**OPTIONAL CERTIFICATION
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.204(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.



Signature/Authorized Official

03/12/2021
Date

Erie County Executive

Title

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Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.


Signature/Authorized Official

03/12/2021
Date

Erie County Executive

Title

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for such individuals.

Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction's consolidated plan.

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from

publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

 03/12/2021
Signature/Authorized Official Date

Eric County Executive

Title

HOPWA Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility;
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature/Authorized Official

Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

TOWN OF HAMBURG, NEW YORK

2021 “Final” Action Plan
April 1, 2021 - March 31, 2022
(2021 Program Year)



Hamburg Town Board

Supervisor James M. Shaw
Councilman Shawn P. Connolly
Councilwoman Elizabeth C. Farrell
Councilwoman Karen L. Hoak
Councilman Michael R. Petrie

Hamburg Community Development

Christopher Hull; Director
Timothy Regan; Assistant Director

Summary of 2021 CDBG Projects & Funding; Program Income; HOME Funds

Town of Hamburg 2021 Community Development Block Grant Funds:	\$437,064.00
Program Planning and Administration	\$ 45,000.00
Removal of Architectural Barriers - Hamburg Town Hall	\$100,000.00
Town of Hamburg Infrastructure Reconstruction (Hamburg Highway)	\$125,000.00
Village of Blasdell; Infrastructure Reconstruction (Miller Avenue)	\$117,064.00
Fair Housing/Housing Counseling Activities:	\$ 50,000.00
2021 Anticipated CDBG "Program Income" Funds:	\$ 80,000.00
Housing Renovation (Program Income)	\$ 15,000.00
Economic Development (Program Income)	\$ 65,000.00
2021 Anticipated HOME Program Funds (via Erie County Consortium):	\$156,720.00
Administration (Consortium)	\$ 15,672.00
Housing Renovation Program "Conditional Grants for Low Income"	\$117,540.00
CHDO	\$ 23,508.00
TOTAL 2019 ANTICIPATED FUNDING (ALL FUNDS):	\$673,784.00



Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

The Town of Hamburg, New York is a federal Community Development Block Grant (CDBG) Entitlement Community and is also part of the Erie County/Town of Hamburg HOME Consortium thus allowing the town to also receive federal HOME Investment Partnership Program funding on an annual basis. Since the Town of Hamburg and the County of Erie are linked through the federal HOME program from the United States Department of Housing and Urban Development (HUD), the Town of Hamburg is required to file its Five Year Consolidated Plan as well as its Annual One Year Action Plan as part of Erie County Consolidated Plan/Annual Action Plan submission to HUD. The Town of Hamburg, New York is an “Entitlement Community” receiving its own Community Development Block Grant (CDBG) funding separate from the Erie County allocation. Because of the way this is set up within the regulations for the United States Department of Housing and Urban Development (HUD), the Town of Hamburg submits this document as a separate section within the Erie County Consortium Consolidated Plan/Action Plan submission. This section focuses on the Town of Hamburg, New York only as it relates to its housing and community development goals and objectives.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The 2021 Action Plan provides a framework to address the needs of the Town for the next year using CDBG funds. The objectives guiding the proposed activities are:

- Providing Decent Affordable Housing
- Creating Suitable Living Environments
- Creating Economic Opportunities

Outcomes show how programs and activities benefit a community or the people served. The outcomes that will illustrate the benefits of each activity funded by the CDBG program is:

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

The overall goal of the Community Development Block Grant (CDBG) program is the development of viable urban/suburban communities that will provide decent housing, a suitable living environment and expanded economic opportunities, principally for low-to-moderate income persons. The main focus of

Annual Action Plan
2021

the Town's program is in the area of housing and neighborhood preservation. The Program's broad goals can be accomplished by a variety of eligible activities including housing rehabilitation, improvements to public facilities and infrastructure such as sewers and roads, economic development activities and public services.

The Town also uses CDBG funds to create a suitable living environment by funding public services that improve the lives of its low-moderate income residents by providing services to seniors, food services, and battered spouses.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The latest Community Assessment from the local HUD office showed that the Town of Hamburg is administering its federal CDBG funds in an effective & compliant manner. The Town of Hamburg identifies and expends annual program funding usually within the same year it is awarded. The following provides a brief summary from the latest HUD review of the Town of Hamburg program which followed a HUD approved Consolidated Plan/Annual Action Plan. The activities undertaken during the year were consistent with the Towns Plan goals, objectives, & priority needs. They include the following key elements:

Hamburg's priority needs included: Waterline replacements in the villages; Road/Infrastructure reconstruction; Public service programs; Fair Housing/Housing Counseling; Economic activities; Housing renovation/rehabilitation activities.

Hamburg's goals included: Public Services; Public Infrastructure Improvements; Housing Rehabilitation; Economic Assistance

The actual Program Year expenditures recorded in IDIS reflect that the Town did expend HUD funds in these broad categories and within the requirements of HUD funding regulations.

Hamburg's latest CAPER was received on June 29, 2020. The report was determined to be substantially complete. This report included an adequate description of Hamburg's progress and performance throughout the program year. HUD's Fair Housing Equal Opportunity (FHEO) Division evaluated Hamburg's 2019 CAPER on September 3, 2020 and determined that the Town of Hamburg has adequately demonstrated its commitment to furthering fair housing. The Town of Hamburg remains in compliance with civil rights laws & applicable regulations. There were no pending Department of Justice civil-rights lawsuits or letters of noncompliance. Based on FHEO's records, the Town appears to be following HUD's Certifications & civil rights laws contained therein. To address any obstacles to meeting underserved fair housing needs, the Town of Hamburg contracted with Belmont Housing Resources and Housing Opportunities Made Equal Inc. to provide a wide variety of fair housing services. The Town has provided office space and selected hours at the Community Development offices for Belmont and HOME to address any questions or concerns regarding fair housing. During these scheduled times, citizens can come in for housing counseling services for a variety of housing concerns including landlord-tenant rights, legal and housing discrimination issues. The town also has its own Fair Housing Law and is

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currently seated as President of the Erie County Fair Housing Partnership. To reduce the number of poverty-level families, the Town of Hamburg's economic assistance program provided loans to for-profit businesses for the purpose of job creation or job retention especially for persons of low- and moderate-incomes. The Town of Hamburg has conducted the required hearings and public notifications to comply with citizen participation requirements.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Town of Hamburg held eight public hearings during the summer/fall 2020 for citizen/public participation and input for our 2021 Community Development Block Grant process. While this is less than normal for the town, the COVID-19 pandemic certainly impacted this process. In trying to adjust to the pandemic, the town did offer a specific e-mail address, cdpublichearing@townofhamburgny.com to offer further input from residents. These in-person hearing were held at Hamburg Town Hall as well as at the Villages of Blasdell and Hamburg. The dates and times are listed below:

Monday, September 14, 2020 @ 5:00 p.m. & 6:30 p.m. (Hamburg Town Hall)

Wednesday, September 16, 2020 @ 5:30 p.m. (Blasdell Village Hall)

Monday, September 28, 2020 @ 5:00 p.m. & 6:30 p.m. (Hamburg Town Hall)

Wednesday, October 7, 2020 @ 4:00 p.m. (Hamburg Village Hall)

Monday, October 19, 2020 @ 5:00 p.m. & 6:30 p.m. (Hamburg Town Hall)

Furthermore, the Town of Hamburg also included a specific e-mail address (cdpublichearing@townofhamburgny.com) on the towns webpage and within the published legal notices, per our updated Citizen Participation Plan, thus allowing citizens to send comments virtually. Citizen participation in this regard is listed below:

The Public Hearings were listed on the Town's website (www.townofhamburgny.com), the Community Development web-page, as well as being published within the Hamburg Sun, the towns official newspaper of record. Both the PennySaver and Front Page utilized in the past for public notices went out of business. In addition, each day prior to a hearing(s) signage was placed in front of the hearing location and within the venues. A summary table of all the meetings held during the 2021 action plan citizen participation process is included below. The towns Citizen Participation Plan provides for and encourages public participation and consultation, emphasizing involvement by citizens, organizations, and agencies that serve low/moderate-income persons. The process was updated within the summer of 2020 due to and in response to COVID-19.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The following comments were received during our process:

Monday, September 14, 2020 - 5:00 p.m.: One person requested an application and information

Annual Action Plan
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pertaining to the towns First Time Home Buyer program. One person requested general CDBG program information via e-mail based upon the legal notice in The Sun.

Monday, September 14, 2020 - 6:30 p.m.: One person asking for funding for a “neighborhood” project pertaining to recreation showed up to the public hearing. Information and referral to the towns Recreation Department were provided, since the project was not an eligible CDBG activity.

Wednesday, September 16, 2020 – 5:30 p.m.: A presentation was made to members of the Blasdel Village Board and public. One person requested further information about the CDBG program for a school project.

Monday, September 28, 2020 – 5:00 p.m.: Two requests for general CDBG program information. One request for a First Time Homebuyer application, provided. One request for information pertaining to eviction assistance, provided.

Monday, September 28, 2020 – 6:30 p.m.: One request for housing renovation services, application/information provided.

Wednesday, October 7, 2020 - 4:00 p.m.: Presentation made to Hamburg Village Departments and public. Village officials queried about how to complete an income survey to determine project eligibility now that the 2019 American Community Survey had eliminated a target area within the village.

Monday, October 19, 2020 - 5:00 p.m.: A request was made for information pertaining to improvements to sewer lines on a town street. Street was not within a specific target area.

Monday, October 19, 2020 – 6:30 p.m.: One request for eviction assistance was made via the towns Homeless Prevention Program. A program explanation and application was provided.

During the 2021 Action Plan hearing process, attendance was down due to the COVID-19 pandemic. In-person hearings were allowed with masks and social distancing, but getting the general public to attend hearings was difficult. The publication of information on the town/department websites and in the official newspaper seems to have had less impact during the pandemic. The specific e-mail address for public hearing information/request also did not get utilized as much as hoped. We can only hope that a return to some sort of normalcy will occur in the near future.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments were accepted.

7. Summary

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role		Name	Department/Agency
CDBG Administrator		Hamburg	Department of Community Development
HOME Administrator		Hamburg	Department of Environment & Planning

Table 1 – Responsible Agencies

Narrative

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

CDBG Administrator Hamburg Department of Community Development

HOME Administrator PJ: Erie County Department of Environment & Planning

The Town of Hamburg Department of Community Development is primarily responsible for administering programs covered by the Consolidated Plan.

Consolidated Plan Public Contact Information

Christopher Hull, Director, of Community Development

Town of Hamburg, Department of Community Development

6100 South Park Avenue

Hamburg, NY 14075

Phone: 716.648.6216

Email: chull@townofhamburgny.com or cdpublichearing@townofhamburgny.com

Annual Action Plan
2021

Consolidated Plan Public Contact Information

Action Plan Contact Information:

Town of Hamburg
Department of Community Development
6100 South Park Avenue
Hamburg, New York 14075
(716) 648-6216

Annual Action Plan
2021

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The public participation process for the 2021 Action Plan involved a number of public meetings, stakeholder consultations and individual contacts. Many housing, social service agencies, and other organizations serving the Town of Hamburg were consulted during the development of this Action Plan, which was made difficult during the COVID-19 crisis.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

The Town of Hamburg utilized its current outreach efforts as updated with its Citizen Participation Plan during the COVID-19 pandemic to maximize input from a cross-section of residents and stakeholders. This effort included public meetings, published meeting notices (September 11, September 25 and October 9 of 2020), stakeholder meetings, and phone conversations/interviews. In addition, the Town of Hamburg implements many affordable housing and community development activities with its CDBG and HOME programs, while also preparing a detailed Consolidated Annual Performance Evaluation Report (CAPER) and the Annual Plan which provides for technical assistance and collaboration with non-profit and for-profit housing developers and social service agencies.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Town of Hamburg contracts with the following services providers to provide specific efforts with Continuum of Care activities outside of the normal realm of funding. These services provide for families, children, veterans, disabled, youth and homeless populations. These contracted agencies include the following: Housing Opportunities Made Equal, Inc. (HOME) - Fair Housing services directly to town residents as well as Mobility Counseling and grants for specific clients trying to move out of poverty stricken areas to suburban locations within the Town of Hamburg. Belmont Housing Resources for WNY - Budget, Credit, Debt and Foreclosure counseling services as well as Housing Counseling classes for residents including mandatory counseling for the towns First Time Homebuyer conditional grant program. Center for Elder Law and Justice - Legal services for resident/clients needing services for evictions or disputes. Neighborhood Legal Services, Inc. - Due to the COVID-19 pandemic, the Town of Hamburg continued a contract with this agency to provide homelessness prevention legal assistance to town residents/clients. Furthermore, the Town of Hamburg has its own Homeless Prevention Program which can assist residents/clients with rental and utility assistance to keep them housed.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The Town of Hamburg does consult with Erie County as a partner as well as Continuum of Care agencies throughout the year, but does not receive any ESG funding.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	HOUSING OPPORTUNITIES MADE EQUAL, INC.
	Agency/Group/Organization Type	Services-Education Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Fair Housing & Housing Mobility Counseling
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Town of Hamburg consults with HOME, Inc. on a constant basis throughout the year to ensure coordination is up to date.
2	Agency/Group/Organization	Belmont Housing Resources for WNY
	Agency/Group/Organization Type	Housing PHA Services-homeless Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Budget, Credit, Debt, Foreclosure Counseling
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Town of Hamburg consults with Belmont Housing Resources on a constant basis throughout the year to ensure coordination is up to date.
3	Agency/Group/Organization	Center for Elder Law and Justice
	Agency/Group/Organization Type	Housing Services-Education Services - Victims Legal Services

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Legal Services for clients
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As a contracted agency, the Town of Hamburg conducts monthly consultations with the agency as well as trying to provide services virtually during the COVID-19 pandemic.
4	Agency/Group/Organization	NEIGHBORHOOD LEGAL SERVICES
	Agency/Group/Organization Type	Housing Services-Education Services - Victims Legal Services
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Town of Hamburg extended its contract with Neighborhood Legal Services to provide eviction services for residents/clients facing eviction during the COVID-19 pandemic.

Identify any Agency Types not consulted and provide rationale for not consulting

All agencies wishing to be included were consulted/heard. No agencies wishing to be consulted/heard were not included.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Erie County	

Table 3 - Other local / regional / federal planning efforts

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Narrative

Even though the Town of Hamburg is a stand alone CDBG Grantee, it is also part of the Erie County/Town of Hamburg HOME Consortium, thus requiring direct interaction with all Erie County agencies or agencies contracted by Erie County for Continuum of Care services.

AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Town of Hamburg held eight public hearings during the summer/fall 2020 for citizen/public participation and input for our 2021 Community Development Block Grant process. These in-person hearing were held at Hamburg Town Hall as well as at the Villages of Blasdell and Hamburg. The dates and times are listed below: Monday, September 14, 2020 @ 5:00 p.m. & 6:30 p.m. (Hamburg Town Hall) Wednesday, September 16, 2020 @ 5:30 p.m. (Blasdell Village Hall) Monday, September 28, 2020 @ 5:00 p.m. & 6:30 p.m. (Hamburg Town Hall) Wednesday, October 7, 2020 @ 4:00 p.m. (Hamburg Village Hall) Monday, October 19, 2020 @ 5:00 p.m. & 6:30 p.m. (Hamburg Town Hall) Furthermore, the Town of Hamburg also included a specific e-mail address (cdpublichearing@townofhamburgny.com) on the towns webpage and within the published legal notices, per our updated Citizen Participation Plan, thus allowing citizens to send comments virtually. Citizen participation in this regard is listed: The Public Hearings were listed on the Town's website (www.townofhamburgny.com), the Community Development web-page, as well as being published within the Hamburg Sun, the towns official newspaper of record. Both the PennySaver and Front Page utilized in the past for public notices went out of business. In addition, each day prior to a hearing(s) signage was placed in front of the hearing location and within the venues. A summary table of all the meetings held during the 2021 action plan citizen participation process is included below. The towns Citizen Participation Plan provides for and encourages public participation and consultation, emphasizing involvement by citizens, organizations, and agencies that serve low/moderate-income persons. The process was updated within the summer of 2020 due to and in response to COVID-19.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	All			All comments were accepted	

Annual Action Plan
2021

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			<p>The Town of Hamburg held eight public hearings during the summer/fall 2020 for citizen/public participation and input for our 2021 Community Development Block Grant process. These in-person hearings were held at Hamburg Town Hall as well as at the Villages of Blasdell and Hamburg. The dates and times are listed below: Monday, September 14, 2020 @ 5:00 p.m. & 6:30 p.m. (Hamburg Town Hall) Wednesday, September 16, 2020 @ 5:30 p.m. (Blasdell Village Hall) Monday, September 28, 2020 @ 5:00 p.m. & 6:30 p.m. (Hamburg Town Hall) Wednesday, October 7, 2020 @ 5:00 p.m. (Hamburg Town Hall)</p>	<p>Monday, September 14, 2020 - 5:00 p.m.: One person requested an application and information pertaining to the towns First Time Home Buyer program. One person requested general CDBG program information via e-mail based upon the legal notice in The Sun. Monday, September 14, 2020 - 6:30 p.m.: One person asking for funding for a "neighborhood" project pertaining to recreation showed up to the public hearing. Information and referral to the towns Recreation Department were provided, since the project was not an eligible CDBG activity. Wednesday, September 16, 2020 5:30 p.m.: A presentation was made to members of the Blasdell Village Board</p>		

Table 4 – Citizen Participation Outreach

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Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	437,064	80,000	0	517,064	0	
Other	public - federal	Public Services Other	0	0	0	0	0	

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Additional resources from both the Town of Hamburg and the Village of Blasdell will be utilized to enhance the federal CDBG funding. Matching

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requirements, if any, will be completed with in-kind services.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

N/A

Discussion

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	ADA Modification Imp. and Removal of Arch Barriers	2020	2024	Non-Housing Community Development			CDBG: \$125,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Public Infrastructure Improvements	2020	2024	Non-Housing Community Development	Town of Hamburg Exception Target Area #1 Village of Blasdel Exception Target Area #3 Town of Hamburg Exception Target Area #2 Town of Hamburg Exception Target Area #4 Town of Hamburg Exception Target Area #5 Town of Hamburg/Woodlawn/Hoover Beach Exception Target Area #6 Town of Hamburg Exception Target Area #7 Village of Blasdel Exception Target Area #8 Town of Hamburg Exception Target Area #11 Town of Hamburg Exception Target Area #10 Town of Hamburg Exception Target Area #9	Public Infrastructure Improvements	CDBG: \$200,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
3	Fair Housing Services	2020	2024	Affordable Housing		Fair Housing Counseling	CDBG: \$40,000	Public service activities for Low/Moderate Income Housing Benefit: 100 Households Assisted

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Homeless Prevention Program	2020	2024	Homeless		Public Services	CDBG: \$15,000	Public service activities for Low/Moderate Income Housing Benefit: 10 Households Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	ADA Modification Imp. & Removal of Arch Barriers
	Goal Description	Removal of Architectural Barriers to accessibility.
2	Goal Name	Public Infrastructure Improvements
	Goal Description	Road improvements within town and Village of Blasdell target areas..
3	Goal Name	Fair Housing Services
	Goal Description	Provision of services for fair housing, mobility, and housing counseling.
4	Goal Name	Homeless Prevention Program
	Goal Description	Provision of funds for the Town of Hamburg Homeless Prevention Program.

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AP-35 Projects - 91.420, 91.220(d)

Introduction

The Town of Hamburg's high priorities include public facility improvements, improved water/sewer lines, street improvements, sidewalks, and removal of architectural barriers for persons of such need. In addition the Town of Hamburg also completes many housing and public services programs as priority projects. Geographically, the Town of Hamburg focuses the majority of CDBG funds in its HUD defined Low and Moderate Income areas, the last being designated April, 2019 ACS. The Town of Hamburg Department of Community Development administers CDBG funds provided to the Town by HUD in an ongoing basis, which usually expends its funding the same year it is received. The primary goal of the Community Development Program is to develop and maintain viable communities with respect to housing, neighborhoods, public services and economic opportunities. The Town relies on a network of public, private sector, and non-profit organizations to implement the Strategic Plan, particularly to address homelessness and special needs populations.

#	Project Name
1	Program Administration/Planning
2	Removal of Architectural Barriers
3	Town of Hamburg Infrastructure Project
4	Village of Blasdell Infrastructure Project
5	Fair Housing/Housing Counseling Activities

Table 7 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Lack of funding is the biggest barrier to addressing underserved needs.

AP-38 Project Summary
Project Summary Information

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1	Project Name	Program Administration/Planning
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$45,000
	Description	Funding for CDBG program administration as well as for Planning activities with the new Comprehensive Master Plan being completed.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	N/A Planning/Administration
	Location Description	6100 and 6122 South Park Avenue, Hamburg, New York 14075
	Planned Activities	General program administration as well as planning activities for a new Comprehensive Master Plan.
2	Project Name	Removal of Architectural Barriers
	Target Area	
	Goals Supported	ADA Modification Imp. & Removal of Arch Barriers
	Needs Addressed	
	Funding	CDBG: \$100,000
	Description	Removal of Architectural Barriers at Hamburg Town Hall. A continuation of an existing project to comply with the ADA. This project will add accessibility to the main, front entrance at Hamburg Town Hall, 6100 South Park Avenue.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Unknow, but Hamburg Town Hall is the main location for town government businesses and expanding accessibility will help the underserved within the community.
	Location Description	6100 South Park Avenue, Hamburg, NY 14075

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	Planned Activities	Removal of Architectural Barriers at Hamburg Town Hall. A continuation of an existing project to comply with the ADA. This project will add accessibility to the main, front entrance at Hamburg Town Hall, 6100 South Park Avenue
3	Project Name	Town of Hamburg Infrastructure Project
	Target Area	Town of Hamburg Exception Target Area #1 Village of Blasdell Exception Target Area #3 Town of Hamburg Exception Target Area #2 Town of Hamburg Exception Target Area #4 Town of Hamburg Exception Target Area #5 Town of Hamburg/Woodlawn/Hoover Beach Exception Target Area #6 Town of Hamburg Exception Target Area #7 Village of Blasdell Exception Target Area #8 Town of Hamburg Exception Target Area #11 Town of Hamburg Exception Target Area #10 Town of Hamburg Exception Target Area #9
	Goals Supported	
	Needs Addressed	Public Infrastructure Improvements
	Funding	CDBG: \$125,000
	Description	Use of CDBG funds for public facilities in conjunction with the Town of Hamburg Highway Department. Target areas roads to be milled/repaved. Funds to be utilized for materials only.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Unknown at the time of application since the targeted streets have yet to be identified.
	Location Description	
4	Project Name	Village of Blasdell Infrastructure Project
	Target Area	Village of Blasdell Exception Target Area #3
	Goals Supported	
	Needs Addressed	Public Infrastructure Improvements

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	Funding	CDBG: \$117,064
	Description	Milling and paving of roadway and storm sewer work on Miller Avenue between South Park and Labelle within the Village of Blasdell.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Milling and paving of roadway and storm sewer work on Miller Avenue between South Park and Labelle within the Village of Blasdell.
	Planned Activities	Milling and paving of roadway and storm sewer work on Miller Avenue between South Park and Labelle within the Village of Blasdell.
5	Project Name	Fair Housing/Housing Counseling Activities
	Target Area	
	Goals Supported	
	Needs Addressed	Fair Housing Counseling
	Funding	CDBG: \$50,000
	Description	The Town of Hamburg funds multiple Fair Housing and Housing Counseling Activities. Funding is utilized to provide contracts with the following agencies and purposes: Housing Opportunities Made Equal (HOME), Inc. is utilized for extensive fair housing counseling, fair housing as well as mobility activities. Belmont Housing Resources for WNY is utilized for financial counseling directly tied to housing clients. Services include budget, credit, debt, foreclosure, and first-time homebuyer counseling.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Fifty (50) low/moderate income families.
	Location Description	Town-wide

	Planned Activities	The Town of Hamburg funds multiple Fair Housing and Housing Counseling Activities. Funding is utilized to provide contracts with the following agencies and purposes: Housing Opportunities Made Equal (HOME), Inc. is utilized for extensive fair housing counseling, fair housing as well as mobility activities. Belmont Housing Resources for WNY is utilized for financial counseling directly tied to housing clients. Services include budget, credit, debt, foreclosure, and first-time homebuyer counseling.
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AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The Town of Hamburg continues to utilize its CDBG funding to provide assistance for persons of low/moderate income qualification. This includes projects within HUD exception target areas as well as direct benefit programs to eligible clients. General housing and homeless prevention funds are distributed on a client basis, while target area projects are located within HUD designated exception areas per the ACS.

Geographic Distribution

Target Area	Percentage of Funds
Town of Hamburg Exception Target Area #1	
Village of Blasdell Exception Target Area #3	
Town of Hamburg Exception Target Area #2	
Town of Hamburg Exception Target Area #4	
Town of Hamburg Exception Target Area #5	
Town of Hamburg/Woodlawn/Hoover Beach Exception Target Area #6	
Town of Hamburg Exception Target Area #7	
Village of Blasdell Exception Target Area #8	
Town of Hamburg Exception Target Area #11	
Town of Hamburg Exception Target Area #10	
Town of Hamburg Exception Target Area #9	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Outside of direct assistance to low/moderate income persons, the Town of Hamburg utilizes its HUD Target areas for all other funding allocations. This allows for maximum amount of assistance to l/m income persons and areas.

Discussion

Annual Action Plan
2021

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

The Town of Hamburg continues to be proactive in trying to remove barriers to affordable housing. From constructing two, new-build affordable housing subdivisions, to using CDBG and HOME funds to promote and fund the towns First Time Homebuyer Grant program, with over five hundred clients purchasing homes, the town continues to remove such barriers.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Furthermore, the Town of Hamburg was the first community within the state to pass and implement a law that provides for inclusionary zoning, removing more barriers to affordable housing.

Discussion

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

Actions planned to address obstacles to meeting underserved needs

Actions planned to foster and maintain affordable housing

Actions planned to reduce lead-based paint hazards

Actions planned to reduce the number of poverty-level families

Actions planned to develop institutional structure

Actions planned to enhance coordination between public and private housing and social service agencies

Discussion

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	80,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	80,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

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Discussion

The Town of Hamburg continues to utilize its CDBG funding for low and moderate income areas and persons toward our 100% utilization.

Attachments

Citizen Participation Comments

The Town of Hamburg held eight public hearings during the summer/fall 2020 for citizen/public participation and input for our 2021 Community Development Block Grant process. These in-person hearing were held at Hamburg Town Hall as well as at the Villages of Blasdell and Hamburg. The dates and times are listed below:

Monday, September 14, 2020 @ 5:00 p.m. & 6:30 p.m. (Hamburg Town Hall)

Wednesday, September 16, 2020 @ 5:30 p.m. (Blasdell Village Hall)

Monday, September 28, 2020 @ 5:00 p.m. & 6:30 p.m. (Hamburg Town Hall)

Wednesday, October 7, 2020 @ 4:00 p.m. (Hamburg Village Hall)

Monday, October 19, 2020 @ 5:00 p.m. & 6:30 p.m. (Hamburg Town Hall)

Furthermore, the Town of Hamburg also included a specific e-mail address (cdpublichearing@townofhamburgny.com) on the towns webpage and within the published legal notices, per our updated Citizen Participation Plan, thus allowing citizens to send comments virtually. Citizen participation in this regard is listed below:

The Public Hearings were listed on the Town's website (www.townofhamburgny.com), the Community Development web-page, as well as being published within the Hamburg Sun, the towns official newspaper of record. Both the PennySaver and Front Page utilized in the past for public notices went out of business. In addition, each day prior to a hearing(s) signage was placed in front of the hearing location and within the venues. A summary table of all the meetings held during the 2021 action plan citizen participation process is included below. The towns Citizen Participation Plan provides for and encourages public participation and consultation, emphasizing involvement by citizens, organizations, and agencies that serve low/moderate-income persons. The process was updated within the summer of 2020 due to and in response to COVID-19. The following comments were received during our process:

Monday, September 14, 2020 - 5:00 p.m.: One person requested an application and information pertaining to the towns First Time Home Buyer program. One person requested general CDBG program information via e-mail based upon the legal notice in The Sun.

Monday, September 14, 2020 - 6:30 p.m.: One person asking for funding for a "neighborhood" project pertaining to recreation showed up to the public hearing. Information and referral to the towns Recreation Department were provided, since the project was not an eligible CDBG activity.

Wednesday, September 16, 2020 – 5:30 p.m.: A presentation was made to members of the Blasdell Village Board and public. One person requested further information about the CDBG program for a school project.

Monday, September 28, 2020 – 5:00 p.m.: Two requests for general CDBG program information. One request for a First Time Homebuyer application, provided. One request for information pertaining to eviction assistance, provided.

Monday, September 28, 2020 – 6:30 p.m.: One request for housing renovation services, application/information provided.

Wednesday, October 7, 2020 - 4:00 p.m.: Presentation made to Hamburg Village Departments and public. Village officials queried about how to complete an income survey to determine project eligibility now that the 2019 American Community Survey had eliminated a target area within the village.

Monday, October 19, 2020 - 5:00 p.m.: A request was made for information pertaining to improvements to sewer lines on a town street. Street was not within a specific target area.

Monday, October 19, 2020 – 6:30 p.m.: One request for eviction assistance was made via the towns Homeless Prevention Program. A program explanation and application was provided.

During the 2021 Action Plan hearing process, attendance was down due to the COVID-19 pandemic. In-person hearings were allowed with masks and social distancing, but getting the general public to attend hearings was difficult. The publication of information on the town/department websites and in the official newspaper seems to have had less impact during the pandemic. The specific e-mail address for public hearing information/request also did not get utilized as much as hoped. We can only hope that a return to some sort of normalcy will occur in the near future.

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Grantee SF-424's and Certification(s)

OMB Number 4340-0004
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
<div> <div> 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Corrected Application </div> <div> 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision </div> <div> 3. If Request, select appropriate listing: <input type="text"/> 4. Other (Specify): <input type="text"/> </div> </div>		
5. Date Received: 08/12/2021		6. Applicant Identifier: <input type="text"/>
7a. Federal Entity Identifier: 1-21-MC-33-0010		7b. Federal Award Identifier: <input type="text"/>
State Use Only:		
8. Date Received by State: <input type="text"/>		9. State Application Identifier: <input type="text"/>
B. APPLICANT INFORMATION:		
10a. Legal Name: Town of Hamburg, New York		
10b. Employer/Taxpayer Identification Number (EIN/TIN): 15-8038770		10c. Organization DUNS: 3616645143636
11. Address:		
* Street: 5100 Beach Park Avenue		
Street: <input type="text"/>		
* City: Lansing		
County/Parish: <input type="text"/>		
* State: NY, New York		
* Zip: <input type="text"/>		
* Zip / Postal Code: 10045-0903		
c. Organizational Unit:		
Department Name: Community Development		Division Name: <input type="text"/>
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr. * First Name: Christopher		
Middle Name: <input type="text"/>		
* Last Name: Hill		
Suffix: <input type="text"/>		
Title: Director of Community Development		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 7163468115		* Fax Number: <input type="text"/>
* Email: christopher.hill@hamburg.ny.us		

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2021

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/> Type of Applicant 2: Select Applicant Type: <input type="text"/> Type of Applicant 3: Select Applicant Type: <input type="text"/> * Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="4.210"/> CFDA Title: <input type="text"/>	
* 12. Funding Opportunity Number: <input type="text" value=""/> Title: <input type="text" value="Community Development Block Grant 2021 Entitlement Grant"/>	
13. Competition Identification Number: <input type="text"/> Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="2021 CDBG Entitlement Grant"/>	
Attach supporting documents as specified in agency instructions <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant <input type="text" value="01"/>	* b. Program/Project <input type="text" value="01"/>
Attach an additional list of Program/Project Congressional Districts if needed. <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="04/01/2021"/>	* b. End Date: <input type="text" value="03/31/2022"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="437,654.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="80,000.00"/>
* g. TOTAL	<input type="text" value="517,654.00"/>
* 18. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms. If I accept an award, I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001) <input checked="" type="checkbox"/> ** I AGREE <small>** The list of certifications and assurances, or an internal site where you may obtain this list, is contained in the announcement or agency specific instructions</small>	
Authorized Representative:	
Prefix: <input type="text" value="02"/>	* First Name: <input type="text" value="James"/>
Middle Name: <input type="text" value="M"/>	
* Last Name: <input type="text" value="Shaw"/>	
Suffix: <input type="text" value=""/>	
* Title: <input type="text" value="Supervisor"/>	
* Telephone Number: <input type="text" value="016642611"/>	Fax Number: <input type="text" value=""/>
* Email: <input type="text" value="jshaw@oklahoma.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="05/12/2021"/>

Annual Action Plan
2021

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number 4240-0009
Expires on Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0047), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial, and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1688) which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§5101-5107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290dd-3 and 290dd-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

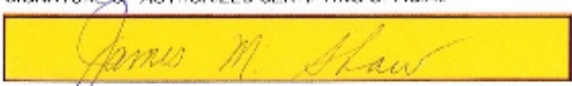
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Standard Form 4243 (Rev. 7-87)
Prescribed by OMB Circular A-132

Annual Action Plan
2021

11. Will comply, or has already complied, with the requirements of Titles I and II of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (or can A-1) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-323); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 108 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Regional Administrator
APPLICANT ORGANIZATION	DATE SUBMITTED
State of New York	03/12/2021

SF-424-D (Rev. 7-87) Back

Annual Action Plan 2021

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

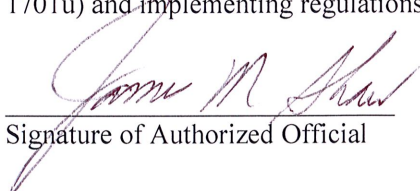
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.


Signature of Authorized Official

3/12/21
Date

SUPERVISOR
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) _____ [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

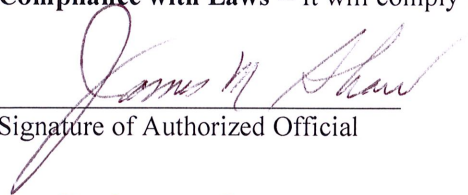
Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official

3/12/21

Date

SUPERVISOR

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.



Town of Hamburg

Erie County, New York

HUD Target Areas
Based on 2011 - 2015 ACS, April 2019

